

#### STATE OF MICHIGAN TRANSMITTAL

TO:	NAME	TO: A NATE.
1. Tom	Makra	5. AROUNTED
2. ////	WAN	6. MAIN 103
3. R	LTV, 7	rndall mon
4.	, , , , , , , , , , , , , , , , , , ,	8.
FOR ACTION A	S INDICATED	
		RECEIVED
SIGNATURE	. REPLY-MY SIGNA	ATURE NOTE AND FORWARD
APPROVAL	REPLY-COPY TO	ME NOTE AND FILE
ACTION	. PLEASE SUMMAI	rize <b>air quandfoiribion</b> eturn
☐ COMMENTS	PLEASE INVESTIG	GATE PLEASE PHONE ME
☐ INFORMATIO	N FORWARDED PE	R REQUEST PLEASE SEE ME
gomes of the company	anding co	believe Ferndale  believe Ferndale  citity we are in  ce there any  Please respond
FROM S	ul R.	DATE 10-30-8
FORM 10580	Called Bul 1	1 1/ ausurer on 11/10/87

DEPARTMENT OF NATURAL RESOURCES
AIR QUALITY DIVISION

3	-12	-37	· —
ン	· 15	- U I	

ACTIVITY REPOR	\	0 5 01
ESTABLISHMENT LTV Steel G./Republic Steel G-P	Oakland	ESTABLISHMENT NO.
equipment location 965 Wanda Street	Northwille	DATE MM DD YY
city/Township Ferndale	M Khuri	TRAVEL TIME
contact and title Ken Miller		TIME ON ACTIVITY
ACTIVITY:  COMPLAINT RECEIVED  COMPLAINT INVESTIGATION  COMPLAINT INVESTIGATION  PARTIAL SCHEDULED INVESTIGATION  COMPLETE SCHEDULED INVESTIGATION  SAMPLE COLLECTED	ON	MPANY
MAJOR SOURCE: A A-1	CEM PSD	
LEVEL OF INSPECTION:   LEVEL	D LEVEL III	<u>.</u>
INSPECTION RESULTS / REMARKS:  SOURCE / CONTROL  PERMIT / RULE / ORDER		STATUS
Paint operation  Storage Silo  Pmt 35384		
On inspection of the point operators 3 spray books covered by permit to install 35-	Two of which	h are two books,
Use water base Paints and they Rule 621. I observed to the		_
book uses to solver (VOC) bose Po	suit but not	used much
the yearly point usage is 600	s gal/yr. and	reduced
with tolern at the ratio of 29	I paint to 1 sa	e telvar.
therefore their VOC emissions are	less than 10 to	sus/yr and
less than 2000/5/wes there fore the	y are example	from in
Rule 621 but the company will a week. by end of 21 st of the STATUS CODE: C = COMPLIANCE; NC = NONCOMPLIANCE; NO = NOT OPE	wouth.	partie !
STATUS CODE: C = COMPLIANCE; NC = NONCOMPLIANCE; NO = NOT OPE	RATING; U = UNKNOWN	
NAME DATE OF REPORT &	14/37 SUPERVISOR'S	<b></b>
PRETERM MEDIAL TARGET BUILDING BARRES	, <i>-</i>	

NATÙRAL RESOURCES COMMISSION

THOMAS J. ANDERSON MARUENE J. FLUHARTY STEPHEN V. MONSMA O. STEWART MYERS DAVID D. OLSON RAYMOND POUPORE HARRY H. WHITELEY



JAMES J. BLANCHARD, Governor

#### DEPARTMENT OF NATURAL RESOURCES

MEKKE BASKBOCK BRACK

Gordon E. Guyer, Director

SOUTHEAST MICHIGAN FIELD OFFICE 15500 Sheldon Road Northville, Michigan 48167

July 9, 1986

Mr. Ron Miller LTV STEEL COMPANY 965: Wanda Avenue Ferndale, Michigan 48220

Dear Mr. Miller:

This letter is in reference to our visit of your plant on July 2, 1986 for the purpose of evaluating your paint operation for a Permit to Operate. At this time we were unable to determine compliance with conditions of Permit to Install #35-85 since the plant was not in operation at the time of the visit.

In order to proceed with the Permit to Operate evaluation, we need to observe the equipment in operation and we need either a paint sample or document to show that you are using compliance paint (water base paint).

The third spray booth that you operate is not covered by the permit you have for the two spray paint operations, therefore, I am requesting that you complete the enclosed application and return it to our Lansing office no later than July 20, 1986. The status of this spray booth is in violation of Rule 201 of the Michigan Air Pollution Control Commission rules as it was installed without first obtaining the required Permit to Install.

If you have any questions regarding these matters, please call this office.

Sincerely,

Marwan A. Khuri, P.E.

Marian AX

Assistant District Engineer

Air Quality Division

(313) 459-1940

MAK/sh Enclosures

B-3716

R1026-1 5/85: (4) 23-34:3

## DEPARTMENT OF NATURAL RESOURCES. AIR QUALITY DIVISION ACTIVITY REPORT

ACTIVITI NEFOR		·
LTV STEEL CO. / Republic Steel Corp.	COUNTY Oakland	ESTABLISHMENT NO. B-3716
EQUIPMENT LOCATION	DISTRICT	DATE MM DD YY
965 Wanda Street	Northville	7 / 2 / 86
CITY / TOWNSHIP	STAFF	TRAVEL TIME
Ferndale	M.Khuri	h hr.
CONTACT AND TITLE		TIME ON ACTIVITY
Ron Miller		4 hrs.
ACTIVITY: SELF-INITIATED INVESTIGATIO	N D PHOTOS TAKEN	
□ COMPLAINT RECEIVED □ CONSENT ORDER INVESTIGATI		MPANY
☐ COMPLAINT INVESTIGATION ☐ SOURCE TEST MONITORING	☐ TELEPHONE CONV	ERSATION
☐ PARTIAL SCHEDULED INVESTIGATION ☐ VISIBLE EMISSIONS OBSERVATION	•	•
COMPLETE SCHEDULED INVESTIGATION   SAMPLE COLLECTED	OTHER	
- CONTRACTOR CONTRACTOR INTERNATION - CANADA CONTRACTOR		
MAJOR SOURCE: X A=1	CEM D PSD	
LEVEL I LEVEL II	LEVEL III	
INSPECTION RESULTS / REMARKS:  SOURCE / CONTROL  PERMIT / RULE / ORDER		STATUS
Paint Operation Permit # 35-85	R. 621	С
Storage Bin Permit #353-84	•	
operations, two of which are used more than the third of the two spray operations are covered by permit applicate this company has converted their paint system to use water in compliance with the permit condition and Rule 6. At the time of inspection, the plant was down so another prior to recommending issuance of Permit to Operate #3. The third spray booth is not used much and according to be exempt since it may be under 10 tons per yr. of VOC I wrote a letter to LTV asking them to fill out a permit spray booth and thus a status of its exemption can be of the content of the status of its exemption can be of the content of the status of its exemption can be of the content of the status of its exemption can be of the content of the status of its exemption can be of the content of the status of its exemption can be of the content of the status of its exemption can be of the content of the status of its exemption can be of the content of the status of its exemption can be of the content of the status of its exemption can be of the content of the status of its exemption can be of the content of the content of the status of its exemption can be of the content of the status of its exemption can be of the content of the status of its exemption can be of the content of	tion #35-85 and Rule eater base paint and the 21.  er visit will be scheme 5-85.  o previous reports, in a less than 2000 lb.  it application for the scheme 2000 lb.	hus they  duled  t could  VOC/mo.
	•	
·		•
STATUS CODE: C = COMPLIANCE; NC = NONCOMPLIANCE; NO = NOT OPE	RATING; U = UNKNOWN	
MACOUNTERS 4) DATE OF -7 /	O O SUPERVISOR	s (2)
DISTRIBUTION: White - Division Office: Canary - Staff Member; Pink - District Office	NITIALS	<del>-                                    </del>

## 



June 13, 1985

RECEIVED

JUN 17 1985

AIR QUALITY DIVISION

Larry F. Kertcher, Chief Air Compliance Branch Air Management Division U. S. EPA, Region V 230 South Dearborn Street Chicago, Illinois 60604

Robert P. Miller, Chief Michigan Department of Natural Resources Air Quality Division
Post Office Box 30028
Lansing, Michigan 48909

LTV Steel Tubular Products Ferndale, Michigan

#### Gentlemen:

Enclosed is the information concerning the Ferndale plant which was requested in a letter dated April 23, 1985 to Mr. David H. Hoag, President of LTV Steel, and signed by Mr. Rothblatt for Mr. Kee.

If you have any questions on this matter, please call me (216-429-6536).

D. A. Woodring

Environmental Management Engineer

Environmental Control

DAW/fh

Attachment

0857a

bcc: J. Fulton

M. L. Harmon

W. L. West

T. A. Zalenski

#### U.S. ENVIRONMENTAL PROTECTION AGENCY

#### SURFACE COATING SUPPLARY

One Copy Of This Form Must Be filled Out For Each Coating Line

1. BUSINESS LICENCE MANE OF CORPORATION, COMPANY OR INDIVIDUAL OWNER:	
LTV STEEL TUBULAR PRODUCTS	
2. PLANT ADDRESS WHERE COATING OPERATION IS LOCATED:	
965 WANDA FERNOALE MI 482	
3. SOURCE DESCRIPTION ( INCLUDING POLLUTION CONTROLS ): EMT J. D. PAINT SPERY MACHINE, CONTINH THE INSIDE	OF ZINC
PLATED STEEL GOLDUIT TUBING. FILTERED EXHA	STACK.
4. SOURCE CLASSIFICATION ( PAPER COATER, METAL FURNITURE, ETC. ):	
METAL TUBING I.D. COATER	
5. COATING EQUIPMENT MANUFACTURER AND MODEL NUMBER:	
LTY STEEL IN-HOUSE DESIGN	
6. METHOD OF APPLICATION:	
SPRAY: DIP COAT	· ·
AIR ATOMIZATION	
MOT AIRLESS AIR DISCUT	
OTHER ( IDENTIFY ) ROLL COAT DINUMBER O	F-COATING STATIONS
7. BOOTH TYPE:	<del></del>
BOOTH AFLOOR DRAFT HALL CRAFT OTHER . CONVEYORIZED (	
BOOTH BFLOOR DRAFT[] WALL DRAFT[] OTHER[] , CONVEYORIZED [	ם '
BOOTH CFLOOR DRAFT WALL DRAFT OTHER . CONVEYORIZED [	<b>o</b>   .
BOOTH DFLOOR DRAFT MALL DRAFT OTHER . CONVEYORIZED [	<b>-</b>
a. DISPOSITION OF COATED ITEMS:	
AIR DRY W OVEN BAKE OTHER	
TIME BETWEEN COATING AND BAKING	•
SRY OR BAKE TIME AND TEMP	
9. OPERATIONAL DATA:	<del></del>
TYPE OF ARTICLE COATEN INSIDE DIAMETER OF CO	YOUT TURING
OPERATING SCHEDULENOURS/DAY DAYS/YEAR 24 Hz.	Day 250 Daylyn
	EACH THINNER PROVIDE:
Type Of Coating: WATER BASE I.D. SCIPPOTE	Identification No.: NOT THINNED
Nanufacturer: AK20 COATINGS	Manufacturer:
Identification No.: 1/13LDV - 4105917	Annual Usage:
Annual Usage: 57,000 GALLONS/YUAR	Chemical Composition: (Indicate If Wt. Or Vol. Percent )
Weight Perical.: 9.16 16/GALLON	(indicate if we. or you. Percent)
Weight Percent Soliids: 25,870	

Chemical Composition of Volatiles:
(Chemical Mames, Indicate If Mt. Or Vol. Percent)

AMMONIA COSTO; BUTTLE CELLOSQUE & STO; ISOPPORIL ALCOHOL & 0.590; XYLOL & 0.590; ALL BY WEKAT Solvent Thinner Ratio:
(Gal. Thinner/Gal. Coating)

WATER AS NEWSOD

#### U.S. ENVIRONMENTAL PROTECTION AGENCY

#### SURFACE COATING SUPPLARY

One Copy Of This Form Must Be Filled Out For Each Coating Line

1. BUSINESS LICENCE RAME OF CORPORATION, COMPANY OR INDIVIDUAL OWNER:  LTV STEEL TUBULAR PRODUCTS  2. PLANT ADDRESS WHERE COATING OPERATION IS LOCATED:  965 WANDA FERNDALE MI 48220  3. SOURCE DESCRIPTION ( INCLUDING POLICITION CONTROLS):  LEMAT I.D. PAILNT SPRAY MACHINE, CANTING THE INSIDE OF TIME PLANT STEEL CONDUIT TUBING. FILTERED EXHAUST STREEL  4. SOURCE CLASSIFICATION ( PAPER COATER, NETAL FURRITURE, ETC. ):  METAL TUBING I, D. COATER  5. COATING EQUIPHENT MANUFACTURER AND MODEL RUMBER:  LTV STEEL IN-HOUSE DESIGN  6. NETHOD OF APPLICATION:  SPRAY:  AIR ATONIZATION.  PRESSURE ATONIZATION.  BOOTH AFLOOR DRAFT! MALL DRAFT! DINER CONVEYORIZED IN BOOTH BFLOOR DRAFT! MALL DRAFT! DINER CONVEYORIZED IN BOOTH B	
2. PLANT ADDRESS WHERE COATING OPERATION IS LOCATED:  965 WANDA FERNDALE MI 48220  3. SOURCE DESCRIPTION ( INCLUDING POLLUTION CONTROLS): LENAT I.D. PALLAT SCROP MACHING, CONTING THE INSIDE OF ZINC PLATED STEEL CONDUIT TUBING. FILTERED EXHAUST STREE  4. SOURCE CLASSIFICATION ( PAPER COATER, NETAL FURNITURE, ETC. ): METAL TUBING I.D. COATER  5. COATING EQUIPMENT MANUFACTURER AND MODEL NUMBER: LTV STEEL IN-HOUSE DESIGN  6. NETHOD OF APPLICATION:  SPRAY:  AIR ATOMIZATION.  PRESSURE ATOMIZATION.  PLON COAT  PROSURE ATOMIZATION  PROSURE ATOMIZATION  PROSURE ATOMIZATION  PROSURE ATOMIZATION  PROSURE ATOMIZATION  PROSURE ATOMIZATION  PLON COAT  PLON	1. DUSTMESS LICENCE NAME OF CORPORATION, COMPANY OR INDIVIDUAL OWNER:
3. SOURCE DESCRIPTION ( INCLUDING POLLUTION CONTROLS ):  LEMT IND PAINT SPRAY MACHINE, CONTING THE INSIDE OF ZINC  LEMT IND PAINT SPRAY MACHINE, CONTING THE INSIDE OF ZINC  CATED STEEL CONDUIT TUBING, FILTERED EMANST STREE  4. SOURCE CLASSIFICATION ( PAPER COATER, METAL FURNITURE, ETC. ):  METAL TUBING I, D. COATER  5. COATING EQUIPMENT MANUFACTURER AND MODEL NUMBER:  LTV STEEL IN-HOUSE DESIGN  6. NETHOD OF APPLICATION:  SPRAY:  AIR ATOMIZATION	LTV STEEL TUBULAR PRODUCTS
3. SOURCE DESCRIPTION ( INCLUDING POLLUTION CONTROLS ):  LEMT I.D. PALAT SONAY MACHING, CONTING THE INSIDE OF ZINC  PLATED STEEL CONDUIT TUBING. FILTERED EMANST STREE  4. SOURCE CLASSIFICATION ( PAPER COATER, METAL FURNITURE, ETC. ):  METAL TUBING I.D. COATER  5. COATING EQUIPMENT MANUFACTURER AND MODEL NUMBER:  LTV STEEL IN-HOUSE DESIGN  6. METHOD OF APPLICATION:  SPRAY:  DIP COAT	2. PLANT ADDRESS WHERE GOATING OPERATION IS LOCATED:
LEMT I.D. PAINT SPRAY MACHING, CANTING THE INSIDE OF EINCE PLATED STEEL CONOUIT TUBING. FILTERED EXHAUST STACE  4. SOURCE CLASSIFICATION (PAPER COATER, METAL FURNITURE, ETC.):  METAL TUBING I.D. COATER  5. COATING EQUIPMENT MANUFACTURER AND MODEL NUMBER:  LTV STEEL IN-HOUSE DESIGN  6. METHOD OF APPLICATION:  SPRAY:  DIP COAT	
4. SOURCE CLASSIFICATION ( PAPER COATER, METAL FURNITURE, ETC. ):  METAL TUBING I.D. COATER  5. COATING EQUIPMENT MANUFACTURER AND MODEL NUMBER:  LTV STEEL IN-HOUSE DESIGN  6. METHOD OF APPLICATION:  SPRAY:  DIP COAT	1. SOURCE DESCRIPTION ( INCLUDING POLLUTION CONTROLS ): LEMT I.D. PAINT SPRAY MACKINE, CONTING THE INSIDE OF ZINC
4. SOURCE CLASSIFICATION ( PAPER COATER, METAL FURNITURE, ETC. ):  METAL TUBING I.D. COATER  5. COATING EQUIPMENT MANUFACTURER AND MODEL NUMBER:  LTV STEEL IN-HOUSE DESIGN  6. METHOD OF APPLICATION:  SPRAY:  DIP COAT	PLATED STEEL CONDUIT TUBING. FILTERED EXHAUST STACK
5. CDATING EQUIPMENT MANUFACTURER AND MODEL NUMBER:  CTV STEEL IN-HOUSE DESIGN  6. NETHOD OF APPLICATION:  SPRAY:  AIR ATOMIZATION	
6. NETHOD OF APPLICATION:  SPRAY:  AIR ATOMIZATION.  PRESSURE ATOMIZATION.  ELECTRO COAT  ELECTRO COAT  ELECTRO COAT  FLOW COAT  FLOW COAT  ELECTRO COAT  ELECTRO COAT  FLOW	METAL TUBING I. D. COATER
6. METHOD OF APPLICATION:  SPRAY:  AIR ATOMIZATION	5. CDATING EQUIPMENT MANUFACTURER AND MODEL HUMBER:
SPRAY:  AIR ATOMIZATION	LTV STEEL IN-HOUSE DESIGN
AIR ATOMIZATION	6. METHOD OF APPLICATION:
PRESSURE ATOMIZATION.  HOT AIRLESS.  ELECTROSTATICAIR DISCII OTMER ( IDENTIFY ) DISCII  BOOTH TYPE:  BOOTH AFLOOR DRAFT MALL DRAFT OTHER . CONVEYORIZED .  BOOTH BFLOOR DRAFT MALL DRAFT OTHER . CONVEYORIZED .  BOOTH CFLOOR DRAFT MALL DRAFT OTHER . CONVEYORIZED .  BOOTH DFLOOR DRAFT MALL DRAFT OTHER . CONVEYORIZED	SPRAY: DIP COAT
ELECTROSTATICAIR DISC ROLL COAT INUMBER OF COATING STATIONS TO COMER ( IDENTIFY ) ROLL COAT INUMBER OF COATING STATIONS TO COMERCE ( IDENTIFY ) ROLL COAT INUMBER OF COATING STATIONS TO COME (IDENTIFY) ROLL COAT CONVEYORIZED TO BOOTH BFLOOR DRAFT MALL DRAFT OTHER CONVEYORIZED TO BOOTH DFLOOR DRAFT MALL DRAFT OTHER CONVEYORIZED TO CONVEYOR	PRESSURE ATOMIZATION.
BOOTH AFLOOR DRAFT[] MALL DRAFT[] OTHER	ELECTROSTATICAIRO DISCO
BOOTH BFLOOR DRAFT   WALL DRAFT   OTHER   CONVEYORIZED    BOOTH CFLOOR DRAFT   WALL DRAFT   OTHER   CONVEYORIZED    BOOTH DFLOOR DRAFT   WALL DRAFT   OTHER   CONVEYORIZED    8. DISPOSITION OF COATED ITEMS:  AIR DRY OVEN BAKE   OTHER    TIME BETWEEN COATING AND BAKING  BRY OR BAKE TIME AND TEMP	7. BOOTH TYPE:
BOOTH CFLOOR DRAFT   WALL DRAFT   OTHER   , CONVEYORIZED    BOOTH DFLOOR DRAFT   WALL DRAFT   OTHER   , CONVEYORIZED    8. DISPOSITION OF COATED ITEMS:  AIR DRY  OVEN BAKE   OTHER    TIME BETWEEN COATING AND BAKING  DRY OR BAKE TIME AND TEMP	BOOTH AFLOOR DRAFT MALL DRAFT OTHER . CONVEYORIZED
BOOTH DFLOOR DRAFT   WALL DRAFT   OTHER   . CONVEYORIZED      8. DISPOSITION OF COATED ITEMS: AIR DRY OVEN BAKE   OTHER      TIME BETWEEN COATING AND BAKING  BRY OR BAKE TIME AND TEMP	BOOTH BFLOOR DRAFT MALL DRAFT OTHER . CONVEYORIZED
8. DISPOSITION OF COATED ITEMS:  AIR DRY OVEN BAKE OTHER OTHER OTHER OTHER OF CONDUIT TUBING  TYPE OF ARTICLE COATED JUSIDE DIDMETER OF CONDUIT TUBING	BOOTH CFLOOR DRAFT MALL DRAFT OTHER . CONVEYORIZED
AIR DRY OVEN BAKE OTHER OTHER OTHER OTHER OTHER OTHER OTHER OTHER OF CONDUIT TUBING OTHER OF ARTICLE COATED JUSIDE DIDMETER OF CONDUIT TUBING	BOOTH DFLOOR DRAFT MALL DRAFT OTHER . CONVEYORIZED
TIME BETWEEN COATING AND BAKING  ORY OF BAKE TIME AND TEMP  9. OPERATIONAL DATA:  TYPE OF ARTICLE COATED JUSIDE DIDMETER OF CONDUIT TUBING	8. DISPOSITION OF COATED ITEMS:
9. OPERATIONAL DATA:  TYPE OF ARTICLE COATED JUSIDE DIRMETER OF CONDUIT TUBING	AIR DRY TO OVEN BAKE TO OTHER T
9. OPERATIONAL DATA:  TYPE OF ARTICLE COATED JUSIDE DIDMETER OF CONDUIT TUBING	ZIME BETWEEN COATING AND BAKING
TYPE OF ARTICLE COATED JUSIDE DIRMETER OF CONDUIT TUBING	DRY OR BAKE TIME AND TEMP
OPERATING SCHEDULEHOURS/DAY DAYS/YEAR 16 HP/DAY 250 DAT/YR	· · · · · · · · · · · · · · · · · · ·
	OPERATING SCHEDULEHOURS/DAT DIDAYS/YEAR 16 H2/DAY 250 DAT/YR

Type Of Coating: WATER BASE J. D. SCIFKOTE

Manufacturer: AKTO COATINGS

Identification No.: 1181W-41059A

Annual Usage: 15,000 GAL/YR

Weight Per Cal.: C1.16 16/6ALLON Weight Percent Solids; 25.8 90

BELLISON X 590 ; ISOPPOPYL ALCOHOLX 0.590; KYLOL (0.590; ALL BY WAINT

#### U.S. ERVIRONMENTAL PROTECTION AGENCY

#### SURFACE COATING SURPLARY

One Copy Of This Form Must Be Filled Out for Each Coating Line

			_
1. BUSINESS LICENCE MANE OF CORPORATION, COMPANY	OR INDIVIDUAL OWNER:		.]
LTV STEEL TUBULAR PRO	DUCTS	•	
2. PLANT ADDRESS WHERE COATING OPERATION IS LOCA	ITED:		
965 WANDA FERN	DALE MI L	18220	
3. SOURCE DESCRIPTION (INCLUDING POLLUTION CONT PIPE AND TUBE OID SPRAY CONTENT ON OID, OF STEEL PIPE & TUBE, F	L. SFRAYS HARI	DRYING VARNI, UST STACK.	54
4. SOURCE CLASSIFICATION ( PAPER COATER, METAL F	URNITURE, ETC. ):	<del></del>	
PIPE COATER	•		
S. COATING EQUIPMENT MANUFACTURER AND MODEL NUMB	ER:	•	
LTV STEEL IN-HOUSE ]	DESIGN	٠.	
6. METHOD OF APPLICATION:			7
SPRAY: DIP	COAT	•	
AIR ATOMIZATION	COAT		1
ELECTROSTATICAIR DISC	TRO' COAT 🔲		<b>-</b>
OTHER ( IDENTIFY )	COAT NUMBER OF	COATING STATIONS L	4
7. BOOTH TYPE:	,		
BOOTH AFLOOR DRAFT WALL GRAFT OTHE	R CONVEYORIZED		<b>[</b>
BOOTH B FLOOR DRAFT WALL DRAFT OTHE	CONVEYORIZED		Ì
BOOTH CFLOOR DRAFT WALL DRAFT OTHE	R . CONVEYORIZED		1
BOOTH DFLOOR DRAFT MALL DRAFT OTHE	RO , CONVEYORIZED D		
a. DISPOSITION OF COATED ITEMS:			
AIR DRY 🖾 OVEN BAKE 🗌 OTHER	3		·
TIME BETWEEN COATING AND BAKING			
DRY OR BAKE TIME AND TEMP			
9. OPERATIONAL DATA:			7
TYPE OF ARTICLE COATED	. —		
OPERATING SCHEDULEHOURS/DAY	IL He/Day	21DAYS/YK	
OR EACH COATING PROVIDE:	11. FOR E	ACH THINKER PROVIDE	· :
Type Of Coeting: CLEAR PIPE CONT	•	Identification No.:	
Manufacturer: ALZO COATINGS		Manufacturen: GA	13.4
Identification No.: 10AHL-19878B		Annual Usage: 26	00 16/yr
Annual Usage: 605 GAC/YIZ	•	Chemical Composition (Indicate If Wt.	A I I
Neight Per Gal.: 7.96 16/GALLON	•	•	10090 By WETGHT
Weight Percent Solids: 27.6%	_	1000000	1-3 10 0/ 4019111
Chemical Composition of Volatiles: (Chemical Numes, Indicate If Ms. Or Vol. Pero NAPTHA 25%; TOLUGE 10%; KYE Solvent Thinner Ratio: (Gal.Thinner/Gal. Cooting)	cmi 1 OC 3090; ALLO	HOL & 0,5%	
3 GAUDY THINNER S GALLO	U Consue		

6/10/85 J. FULTON

(F)

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

David H. Hoag, President <u>LTV Steel Company. Inc.</u> LTV Steel Building 25 West Prospect Cleveland, Ohio 44115

RECEIVED

RECEIVED

MAY 8 1985

APR 2 9 1985

Re: Steel and Tube Division QUALITY DIVISION

Ferndale, Michigan

AIR QUALITY DIVISION

Dear Mr. Moag:

Under the provisions of the Clean Air Act (the Act), as amended, 42 U.S.C. Section 7401 et. seq., the Administrator of the United States Environmental Protection Agency (U.S. EPA) approved portions of an implementation plan submitted by the State of Michigan to attain and maintain the National Ambient Air Quality Standards for Uzone within the Metropolitan Detroit - Port Huron Intrastate Air Quality Control Region. The provisions so approved include Michigan Air Pollution Control Commission Regulations concerning the control of volatile organic compound emissions.

The information requested herein is necessary to determine the extent to which the Steel and Tube Division is in compliance with the applicable provisions of the Michigan State Implementation Plan. Accordingly, under the authority of Section 114 of the Act, 42 U.S.C. Section 7414, (a copy of which is enclosed), you are hereby required to report the information requested on the enclosed form for the twelve month period immediately preceding the date of this letter. In addition, please enclose a copy of the process flow diagram of your operation.

The information required by this letter shall be submitted to Larry F. Kertcher, Chief, Air Compiliance Branch, Air Hanagement Division, U.S. EPA, Region V, no later than 15 calendar days after the date of your receipt hereof. A copy of your reply should also be sent to Robert P. Miller, Chief, Michigan Department of Hatural Resources, Air Quality Division, P.O. Box 30028, Lansing, Michigan 48909. Additionally, any change in the information provided pursuant to this request must be reported no later than five days after such change occurs. This continuous requirement shall remain in effect for a period of six months from the date of this letter.

Please note that, under the regulations appearing at 40 C.F.R. Section 2.100 et. seq., the Steel and Tube Division is entitled to assert a business confidentiality claim covering any portion of the submitted information which is not emission data or necessary to determine emission data. Failure to assert a claim makes the submitted information available to the public without further notice. Information subject to a business confidentiality claim may be available to the public only to the extent set forth in the above-cited regulations.

Any questions concerning this request may be directed to Sheri Bianchin or Kathy Kline of my staff, who may be contacted by telephone at (312) 353-2088.

Your cooperation in providing this information is appreciated.

Sincerely yours,

David Kee, Director Air Management Division

Enclosures

cc: Robert P. Miller, Chief
Air Quality Division
Michigan Department of Natural Resources

Jack Isles, Plant Manager LTV Steel Company, Inc. Steel and Tube Division

PLANTFILE

RECEIVED

APR 1 5 1985

APR 1 1 1985

AIR QUALITY DIVISION

Mr. Jack Isles, Plant Manager LTV Steel Co./Republic Steel Corp. 965 Wanda Avenue Ferndale, Michigan 48220

Dear Mr. Isles:

This letter is in reference to your Permit to Install application for two airless spray coating lines with two dry filter paint spray booths, located at 965 Wanda Avenue, Ferndale, Michigan. This application, identified as No. 35-85, has been evaluated and approved by the Air Quality Division, pursuant to the delegation of authority from the Michigan Air Pollution Control Commission.

This approval is based upon and subject to compliance with all administrative rules of the Commission and conditions stipulated in the attached supplement. Please review these conditions thoroughly so that you may plan for and take the actions necessary to ensure compliance with all of these conditions. Also note that Condition No. 1 requires you to apply, in writing, for a permit to operate within 30 days after completion of construction.

You are advised that contaminants discharged to the surface waters and/or groundwaters; materials disposed of on land; hazardous waste storage, treatment, and disposal; and resource recovery facilities must be approved by other divisions of the Environmental Protection Bureau, Department of Natural Resources. Additionally, your plant environment must be in compliance with all applicable requirements of the Departments of Public Health and Labor.

Approval of this permit does not constitute a waiver by the State of Michigan of its right to bring appropriate legal action against the applicant for failing to obtain the required permit prior to the commencement of construction.

Thank you for your cooperation. Please contact me if you have any questions regarding this permit.

Sincerely,

Asad Khan, Engineer Southeast Permit Unit Air Quality Division (517) 322-1333

AK:nm
Enclosure
cc: Tom Maki

THIS PERMIT FORMALIZES THE Company's Rule G21 Compliance PROGIZAN

#### SUPPLEMENT TO PERMIT NO. 35-85

#### LTV Steel Company Ferndale, Michigan

#### APR 1 1 1985

#### **GENERAL CONDITIONS**

- 1. Rule 208(2) Not more than 30 days after completion of the installation, Applicant shall apply, in writing, for a Permit to Operate. Completion of the installation is deemed to occur not later than commencement of a trial operation pursuant to Rule 201(4). Written application should be sent to: Chief, Permit Unit, Air Quality Division, Department of Natural Resources, P.O. Box 30028, Lansing, Michigan 48909.
- 2. Rule 201(4) Trial operation of the equipment is permitted until the Michigan Air Pollution Control Commission acts upon the Permit to Operate. Operation of the equipment shall permanently cease upon denial of the Permit to Operate by the Commission.
- 3. Rule 208(3)(a) and (c) Applicant shall demonstrate compliance with all Commission rules and with all general and special conditions of this permit prior to issuance of the Permit to Operate.
- 4. Rule 201 Applicant shall not reconstruct, alter, modify, expand, or relocate this equipment unless plans, specifications, and an application for a Permit to Install are submitted to and approved by the Commission.
- 5. Rule 901 Operation of this equipment shall not result in the emission of an air contaminant which causes injurious effects to human health or safety, animal life, plant life of significant value, or property, or which causes unreasonable interference with the comfortable enjoyment of life and property.
- 6. Rule 208(3)(b) Operation of this equipment shall not interfere with the attainment or maintenance of the air quality standard for any air contaminant.
- 7. Operation of this equipment shall not result in significant deterioration of air quality.
- 8. Rule 912 Applicant shall provide notification of any abnormal conditions or malfunction of process or control equipment covered by this application, resulting in emissions in violation of the Commission rules or of any permit conditions for more than two hours, to the District Engineer. Such notice shall be made as soon as reasonably possible, but not later than 9:00 a.m. of the next working day. Applicant shall also, within 10 days, submit to the District Engineer, a written detailed report, including probable causes, duration of violation, remedial action taken, and the steps which are being undertaken to prevent a reoccurrence.
- 9. Approval of this application does not preclude the Applicant from complying with any future regulations which may be promulgated under Act 348, P.A. 1965, as amended.
- 10. Approval of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.
- 11. Act No. 53 Applicant shall notify any public utility of any excavation, tunneling and discharging of explosives or demolition of buildings which may affect said utility's facilities in accordance with Act 53 of the Public Acts of 1974, being sections 460.701 to 460.718 of the Michigan Compiled Laws and comply with each of the requirements of that Act.

- 12. The restrictions and conditions of this Permit to Install shall apply to any person or legal entity which now or shall hereafter own or operate the equipment for which this Permit to Install is issued. Any new owner or operator shall immediately notify the Chief of the Permit Unit, in writing, of such change in ownership or principal operator status of this equipment.
- 13. Rule 201(5) If the installation, reconstruction, relocation, or alteration of the equipment for which this permit has been approved has not commenced within, or has been interrupted for, 18 months, this permit shall become void unless otherwise authorized by the Commission.

LTV Steel Co./Republic Steel Corp. APR 1 1 1985 Permit No. 35-85 Page 3

#### SPECIAL CONDITIONS

- 14. The volatile organic compound (VOC) emission rate from the operation shall not exceed 3.5 pounds per gallon of coating (minus water) as applied.
- 15. There shall be no visible emissions from the operation.
- 16. Applicant shall not operate the paint spray booth unless all exhaust filters are in place and operating properly.
- 17. Applicant shall not substitute any coatings for those described in this permit application which would result in an appreciable change in the quality or any appreciable increase in the quantity of the emission of an air contaminant without prior notification to and approval by the Air Quality Division.

#### DEPARTMENT OF NATURAL RESOURCES AIR QUALITY DIVISION P.O. BOX 30028 LANSING, MICHIGAN 48909

#### STATE OF MICHIGAN

## APPLICATION

APPLICATION NO. 35-85

AIR QUALITY DIVISION

FOR AUTHORITY TO INSTAUL, CONSTRUCT, RECONSTRUCT, RELOCATE, OR ALTER, AND OPERATE PROCESS, FUEL-BURNING, OR REFUSE-BURNING EQUIPMENT AND/OR CONTROL EQUIPMENT (PERMITS TO INSTALL AND OPERATE ARE REQUIRED BY ADMINISTRATIVE RULES PURSUANT TO ACT 348, P.A. 1965, AS AMENDED).

JAN 14 1985

1. APPLICANT Business License Name of Corporation, Rannership, Individual Owner, Government Agency LTV Steel Co./Republic Steel Corp.	PERMIT SECTION
2. MAILING ADDRESS: Number and Street; City or Village; State; Zip Code	
965 Wanda Ave Ferndale, Mi. 48220	
.3: EQUIPMENT OR PROCESS LOCATION: Number and Street: City, Village, or Township	COUNTY ZIP CODE
	Cakland 48220
965 Wanda Ave Fernda Jie	! Cartand ! 40220
Manufacture Steel Tubing and Electrogalvanized Conduit	
5 EQUIPMENT OR PROCESS DESCRIPTION	
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March 25, 1985

RECLIVED

Air Quality Division
Michigan Department of Natural Resources
P. O. Box 30028
Lansing, Mi. 48909

MAR 2 7 1985

AIR QUALITY DIVISION

ATT: Mr. Asad Khan

RE: Revised Material Consumption

Gent lemen:

Our 1984 Michigan Air Pollution Reporting Form (establishment number B3716, source identification number 006) reports 32,000 gallons per year of paint processed through the two covered spray booths. On January 1, 1985, we completed a change in our process which allows us to substitute a water based paint for the previously used solvent based paint. This change is covered by an air use permit application filed with your office on January 8, 1985.

The change to the water based material, plus projected increased production on one of the two reported spray booths will result in the following usage figures:

Material used
Material V.O.C. content
Annual V.O.C. emission
Material used per hour
V.O.C. emission: per hour

72,190 gallons per year 1.65 lb per gallon 59.6 tons per year 13.3 gallons per hour 21.9 lb per hour

If there is any other information you require, please let me know,

Sincerely,

Jesse Fulton Plant Engineer

cc: J. Isles
D. A. Woodring
Marwan Khuri, MDNR, Northville Office

LTV Steel Company



The following statement was prepared by the LTV Steel legal department to answer questions involving the merger transaction which formed LTV Steel from Jones and Laughlin Steel, Incorporated, and Republic Steel Corporation.

"The transaction involved the merger of Republic Steel Corporation, a New Jersey corporation, into ACQCO Corporation, a New Jersey corporation and a wholly-owned subsidiary of the The LTV Corporation, a Delaware corporation headquartered in Dallas. As between the merged corporations, i.e., Republic and ACQCO, Republic is the surviving corporation and by virtue of the merger transaction it is now a wholly-owned subsidiary of The LTV Corporation.

"LTV Steel Company is a Delaware corporation and is authorized to act for Republic Steel Corporation, as well as for Jones and Laughlin Steel, Incorporated (also a wholly-owned subsidiary of The LTV Corporation) in all matters. In other words, Republic Steel Corporation and Jones and Laughlin Steel, Incorporated, both of which are wholly-owned subsidiary corporations of The LTV Corporation, are operated jointly by LTV Steel Company. The physical plant and equipment previously owned by Republic continues to be owned by Republic."

AR OURLY DIVISION

## DEPARTMENT OF NATURAL ...: SOURCES A'IR QUALITY DIVISION

#### ACTIVITY REPORT

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## PLANTFILE

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Permit application submitted
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## RECEIVED

JAN 1 4 1985



AIR QUALITY DIVISION

January 10, 1985

Michigan Department of Natural Resources Air Quality Division 15500 Sheldon Rd. Northville, Mi. 48167

Attention: Mr. Tom Maki

Dear Mr. Maki:

Attached for your information is a copy of the Air Use Permit application which we have filed with your Lansing office. Included is an opinion from LTV Steel's legal department which sets forth the rationale by which we are declining at this time to notify your department of a change of ownership.

Included also are data sheets describing the chemical and physical characteristics of the water based paint which we are using in our process.

If you have further questions, or need any other information, I will be happy to supply it.

Sincerely,

Jesse Fulton Plant Engineer

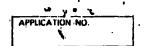
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#### MENT OF NATURAL RESOURCES ALITY DIVISION 3X 30028 NG, MICHIGAN 48909

#### STATE OF MICHIGAN

## AIR USE PERMIT



FOR AUTHORITY TO INSTALL, CONSTRUCT, RECONSTRUCT, RELOCATE, OR ALTER, AND OPERATE PROCESS, FUEL-BURNING, OR REFUSE-BURNING EQUIPMENT AND/OR CONTROL EQUIPMENT (PERMITS TO INSTALL AND OPERATE ARE REQUIRED BY ADMINISTRATIVE RULES PURSUANT TO ACT 348, P.A. 1966, AS AMENDED).

1. APPLICANT: Business License Name of Corporation, Partnership, Individual Owner, Government Agency LTV Steel Co./Republic Steel Corp.	
2 MAILING ADDRESS. Numbur and Street: City or Vallege: State: Zip Code 965 Wanda Ave Ferndale, Mi., 48220	
3 EQUIPMENT OR PROCESS LOCATION: Number and Street; City, Village or Township 965 Wanda Ave Ferndaile	COUNTY ZIP CODE  Oak land 48220
4. GENERAL NATURE OF BUSINESS:  Manufacture Steel Tubing and Electrogelyanized Conduit	
5 EQUIPMENT OF PROCESS DESCRIPTION: See Attached Description	
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#### DESCRIPTION OF EQUIPMENT

The equipment consists of machinery necessary to apply a corrosion resistant coating to the inside surface (I.D.) of 10 foot lengths of Electrical Metallic Tubing (EMT) and Intermediate Metal Conduit (IMC) in the range of 1/2" through 4" trade sizes. Individual tubes roll into a magazine, where they accumulate. A paddle wheel picks up one tube at a time from the magazine and places it in a slotted conveyor. After nine tubes are in place, a synchronized, notched transfer picks them up as a group and transfers them to the spray station.

When the nine tubes are in place at the spray station, a manifold assembly, consisting of 9 lances, each 11 feet long and mounted on a wheeled carrier driven by a chain and hydraulic motor, is signaled to move forward. The lances move into and through the entire length of tube, stop and reverse. At this point an airless spray system is activated, and the coating material, at 1000 psi, is delivered through a hose to the manifold, and distributed through the 9 lances. At the end of each lance, a spray tip with an .013" oriface atomizes the coating material, and the coating is applied to the tube I. D. as the lances are withdrawn from the tube. The coating is delivered at ambient temperature, although provisions have been made to include heating equipment.

Overspray from the end of the tubes is controlled by a spray booth enclosure which is ventilated by a 2 Hp exhaust fan. The transfer mechanism is interlocked so that operation is impossible without the fan running. The exhaust duct contains a series of filters designed to trap paint particles. These filters are changed on a regular basis. Although sampling of the exhaust has not been performed, it is evident that these control devices are sufficient to reduce particulate emissions to a negligible level.

This equipment is designed to operate 24 hours per day 5 days per week, although it normally operates 16 hours per day 5 days per week. The feed rate averages 63 pounds per hour. No fuel is consumed in the process. The operation was installed in 1960 and has been operating since then using a solvent based paint. This permit application serves to formalize LTV Steel's compliance procedure, by notifying of our intent to change to a mater based paint. This change will be effective as of January 1, 1785. A copy of a typical product data sheet for the water based paint is attached. Volume of use remains as previously reported.

43421FUL

**Product Name:** 

Gray Water Borne Conduit

Pipe Coating

**Product Code:** 

11ALW-41059A

Date: October 3, 1984

Prepared For:

LTV Steel

**Product Application:** 

**Product Color:** 

Spray

Gray

**Product Description** 

v.o.c. = 1.65

Flashpoint 132°F (c.c)

**Physical Properties** 

pH: 9.2 1 .2

Wt/Gal.: 9.16 ± .1

Viscosity:

28.2

Type Viscometer:

#2 Zahn

\_Temperature:

77°F ± 5

Crypt:

15 ± 1

3.5W

Conductivity:

Coverage

Theor. Solids by Wt%:

25.8 ±1

Theor. Solids by Vol%: 18 ± 1

Theor. Coverage:

288.72

(Sq. Ft./Gal. @ 1 Mil)

**Application Characteristics** 

Application:

Spray

Applied Viscosity:

28 ± 2

#2 Zahn

Amount & Type of Reducer: Nater as needed

Dry Film Thickness: .5 ± .2

Dry Schedule:

Flash Time: 1 - 2 minutes

Bake Time and Temperature:

4 - 5 C 140°F

Clean Up Thinner:

Water

**Environmental Characteristics** 

Exempt —

xx yes

no

Hazardous Materials:

Material safety data sheet available

upon request.

STATE OF MICHIGAN



NATURAL RESOURCES: COMMISSION THOMAS J. ANDERSON E. R. CAROLLO MARLENE J. FLUHARTY STEPHEN F. MONSMA O. STEWART MYERS RAYMOND POUPORE

HARRY H. WHITELEY

#### JAMES J. BLANCHARD, Governor

#### DEPARTMENT OF NATURAL RESOURCES

RONALD O. SKOOG. Director 15500 Sheldon Road Northville, Michigan 48167 November 14, 1984

LTV STEEL COMPANY 965 Wanda Avenue Ferndale, Michigan 48220

Attention: Mr. Jesse W. Fulton, Jr., Plant Engineer

Dear Mr. Fulton:

On October 18, 1984 I conducted a routine annual inspection of the LTV Steel Company located at 965 Wanda Avenue, Ferndale, Michigan. This inspection was performed in order to determine the company's current status of compliance with the Rules of the Michigan Air Pollution Control Commission.

During this inspection we discussed the company's on-going program to achieve compliance with Rule 621. This rule requires that volatile organic compound (VOC) emissions from miscellaneous metal coating operations be reduced below 3.5 pounds of VOC per gallong of coating, minus water, as applied.

The company is in the final production testing stages for two water based coatings for the tube interior coating operation. This coating change is subject to the provisions of Rule 201 which states in part:

"A person shall not install, construct, reconstruct, relocate, or alter, any process, fuel-burning, or refuse-burning equipment, or control equipment pertaining thereto, which may be a source of an air contaminant, until a permit is issued by the commission."

This would be an appropriate time for LTV Steel Company to submit a permit application in order to formalize this compliance program. An application for an Air Use Permit is attached for your use. Instructions for submitting a complete application are found on the back of the form. Information concerning the composition and expected maximum and average usage volumes of the new water based coatings should be included. This information should be submitted to the address at the top of the application form. An extra copy should be sent to this office for our information.

(continued)

Also discussed during my inspection was Permit to Install No. 353-84 for the lime storage silo with a baghouse emission control system. The operation of this equipment was inspected and was determined to be in compliance with the special conditions of the Permit to Install. However, general condition 12 of this permit (which was issued to the Republic Steel Corporation) states in part:

"Any new owner or operator shall immediately notify the Chief of the Permit Unit, in writing, of such change in ownership or principal operator status of this equipment."

The notification of your change in ownership along with my determination of the compliance status of this equipment should result in the reissuance of this permit to LTV Steel Company.

Please submit the requested permit application and change of ownership notification within 30 days of the date of this letter. Thank you for your cooperation in these matters.

If you should have any questions, please feel free to contact this office.

Sincerely,

David M. Yanochko Environmental Engineer Air Quality Division (313) 459-1940

DMY/sh Enclosure

B-3716

	AQ-10 BUSINESS IDENTIFICATION PLACET + 18
1984 eporting	ESTABLISHMENT B3716  OD NOT DUPLICATE 1983 COMPUTER NUMBER
✓ Firm	DO NOT DEFLICATE 1983 COMPUTER  DOR USE ONLY - INITIALS, DATE PRINTED INFORMATION IF CORRECT DATE ONLY - ACTION
See Instructi on Reverse	PALE III FOR 1984. ENTER ONLY
ITEM 1	A. BUSINESS NAME AS LOCALLY KNOWN (EXAMPLE "OLDSMOBILE DIV.","KENT SCHOOL")  REPUBLIC STEEL CORP
PHYSICAL LOCATION ADDRESS	LITIVI SITIEIEL CORPORATION
AND INFORMATION	E. PLANT NAME (EXAMPLE "POWER PLANT", "STORE-32", "609-BLDG") TUBULAR PRODUCTS GROUP
	[IUBICILAR DILIVI FERNDALLE PLANT]
7 E. D. 1984 DIVISION	C. STREET NUMBER 965 D. STREET NAME WANDA AVE IDO NOT USE P.O.BOXI
1 V E 1 8 1984 IY DIVIS	
<b>11</b>	E. CITY NAME FERNDALE F. ZIF CODE 48220
N S E	
A A A	G. NAME OF OWNER OR PARENT/HOLDING COMPANY REPUBLIC STEEL CORP
	(LITIV: CCR.POPATION)
	H. PERSON TO CONTACT JESSE W FULTON JR REGARDING THIS FORM  1. TELEPHONE NO. (313) 398-1600
<u></u>	
	J. COUNTY OAKLAND 63 K. FEDERAL EMPLOYER'S 34-0486510 REFER TO TABLE 1 IDENTIFICATION NO.
	COUNTY NAMECOUNTY NC
	L. STANDARD INDUSTRIAL CLASSIFICATION REFER TO TABLE II  M. NUMBER OF 130 M. SQUARE FEET OF FLOOR SPACE AT MORE THIS FACILITY (CHECK ONLY ONE) MORE THAN 3000 3000 OR LESS
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ITEM 2	A. NAME
MAILING ADDRESS	
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OF THIS ITEM	
ADDRESS IS THE SAME AS IN ITEM 1	C. STREET ADDRESS OF POST OFFICE BOY
IIA IIEMI I	
	D. CITY NAME E. STATE F. ZIP CODE
	·
PDE 488185111	
FOR ASSISTANC	RETURN FORMS TO DISTRICT OFFICE AIR QUALITY DIVISION
SIGNATURE OF PI COMPLETING FOR	ERSON INDENDED TO THE TOTAL TO
CERTIFICATION BY	11/1/Kraus DATE 11/6/84
PR5608 E'E!	

ounds. I	/ AQ	· :0 EQUIPMENT I		
		•	ESTABLISHME NUME	
their places	DNR USE ONLY - II	NITIALS, DATE DO NOT DUPLICATE PRINTED INFORMA	With the second	ONLY - ACTION
9 7 5 5	idė	SOR 1984. CORRECTIONS O	ENTER DINLY	2. 4. D
		1983 DATA	1984 DATA	<del></del>
1 1		mation currently in our files. e in filling out the form.	Report data for the 1984 calendar ye was never operated during 1984 and tinued then check this box	
ITEM 2	A. SOURCE IDENTIFICATION 006	NUMBER PERMIT NO. 00000000	SOURCE ID. NO. PERMIT	NO. (INCLUDE DASH)
EQUIPMENT	B. EQUIPMENT NAME OR DES	SPRAY BOOTHS		
DESCRIPTION	C. EQUIPMENT CODE ISEE TA	NOOTH ) 1085		
	D. TOTAL NUMBER OF IDENT		للا	······································
·	E. OPERATING SCHEDULE (YE	ARLY AVERAGE) DURS/DAY 242 DAYS/YEAR	L HOURS/DAY	DAYS/YEAF
	F. OPERATING SCHEDULE (PE	RCENT BY QUARTER)	UL NUL-99A RAM-NAL	L-SEP OCT-DEC
UNIT CODES	JAN-MAR APR- 25 % 2	JUN JUL-SEP OCT-DEC 25 %	<u> </u>	
ITEMS G. AND H. 1 POUNDS	G. RATED CAPACITY (PER HO	OUR) OR SIZE OF EACH UNIT UNIT CODE	AMOUNT	UNIT CODE
2 TONS 3 1000 CU. FT.	0.00	0		
4 CU YARDS 5 GALLONS 6 1000 BARRELS 7 MILLION BTU	H. MATERIAL PROCESSED (PE TOTAL AMOUN	UNIT CODE	TOTAL AMOUNT	UNIT CODE
	32000.0	<del></del>		
	10	PMENT CODES (SEE TABLE IV)		
	J. AVERAGE OVERALL PARTI EFFICIENCY, IF KNOWN	CULATE COLLECTION 95.00	لــاه لــلــا	
		TILE ORGANIC COMPOUND CONTENT IS OPERATIONS ONLY (SEE TABLE V, AND 1045-1142)	LL.,L	<b>.</b>
ITEM 3	A. NATURAL GAS	0 1000 CUBIC FEETIYEAR		000 CUBIC FEET/YEAR
FUEL	B. DISTILLATE OIL NO. 1 THRU NO. 4	0 1000 GALLONS/YEAR	<u></u>	000 GALLONS/YEAR
USED TO OPERATE		0.00 % SULFUR	٠٠.٠٠٠	
EQUIPMENT IN ITEM 2	C. RESIDUAL DIL NO. 5 AND NO. 6	O 1000 GALLONS/YEAR		000 GALLONS/YEAR
		0.00 % SULFUR	١٠٠٠٠ ١٠٠٠	
DO NOT	D. WOOD OR BARK	O TONSIYEAR	11111111	ONS/YEAR
DECIMALS IN FUEL QUANTITIES	E. COAL OR COKE	O TONSIYEAR	<u> </u>	ONS/YEAR
		0.00 %SULFUR	«لـلـا، لـا	
		0.00 %ASH	«لـــا ، لـــا »	
, s.	F. OTHER (SPECIFY TYPE)	O AMOUNT (Specify Units)		
:.		0.00 % SULFUR	٠٠٠٠٠	· .
	=PART. 76.	0.00 % ASH 48=HXCY	«لـلـا • لـلـا «	·
PR5809 8/83		40-UVCI		

#### bra , d 3 in their nu AQ- 0 EQUIPMENT IDEN7 (ICATION **ESTABLISHMENT** B3716 NUMBER DO NOT DUPLICATE 1983 COMPUTER DNR USE ONLY - INITIALS, DATE DNR USE ONLY - ACTION CUONS PRINTED INFORMATION IF CORRECT NEW CHANGE DELETE O.K. FOR 1984. ENTER ONLY CORRECTIONS OR ADDITIONS 1983 DATA 1984 DATA ITEM The printed data is information currently in our files. Report data for the 1984 calendar year. If this equipment Use the data as reference in filling out the form. was never operated during 1984 and is permanently discon tinued then check this box ----A. SOURCE IDENTIFICATION NUMBER PERMIT NO. SOURCE ID. NO. PERMIT NO. (INCLUDE DASH) **ITEM** 010 וסונוסו 2 B. EQUIPMENT NAME OR DESCRIPTION (AS YOU REFER TO IT) **EQUIPMENT** PIPE COATER DESCRIPTION C. EQUIPMENT CODE (SEE TABLE VI 1085 (TOP SPRAY BOOTH D. TOTAL NUMBER OF IDENTICAL UNITS (IF OTHER THAN ONE, SEE INSTRUCTIONS) 1 E. OPERATING SCHEDULE (YEARLY AVERAGE) 621 16 HOURS/DAY **DAYS/YEAR** 24 HOURS/DAY 36 DAYSIYEAR JAN-MAR OCT-DEC APR-JUN JUL-SEP F. OPERATING SCHEDULE (PERCENT BY QUARTER) OCT-DEC JAN-MAR APR-JUN JUL-SEP UNIT CODES 」% ∟ 25 % 25 25 25 % FOR AMOUNT G. RATED CAPACITY (PER HOUR) OR SIZE OF EACH UNIT G. AND H. AMOUNT UNIT CODE POUNDS TONS 1000 CU. FT. CU YARDS 0.00 H. MATERIAL PROCESSED (PER YEAR) - SEE TABLE V TOTAL AMOUNT UNIT CODE GALLONS TOTAL AMOUNT UNIT CODE 1000 BARRELS MILLION BTU <del>1500.0</del> I. EMISSION CONTROL EQUIPMENT CODES (SEE TABLE IV) 10 00 00 AVERAGE OVERALL PARTICULATE COLLECTION EFFICIENCY, IF KNOWN 95.00 ┚╺┖ AVERAGE PERCENT VOLATILE ORGANIC COMPOUND CONTENT (BY VOLUME) FOR COATING OPERATIONS ONLY (SEE TABLE V, EQUIP. CODES 1010-1018 AND 1045-1142) «ليلنا» لنك 76.40 A. NATURAL GAS ITEM 1000 CUBIC FEET/YEAR 1000 CUBIC FEET/YEAR 3 B. DISTILLATE OIL NO. 1 THRU NO. 4 1000 GALLONS/YEAR **FUEL** 1000 GALLONS/YEAR USED TO 0.00 % SULFUR ▗▕▃▃▃▏% **OPERATE** EQUIPMENT C. RESIDUAL OIL NO. 5 AND NO. 8 IN ITEM 2 1000 GALLONS/YEAR 1000 GALLONS/YEAR %لبلياول 0.00 % SULFUR D. WOOD OR BARK DO NOT J TONS/YEAR O TONSIYEAR USE E. COAL OR COKE **DECIMALS** TONS/YEAR O TONS/YEAR IN FUEL QUANTITIES 0.00 %SULFUR 0.00 %ASH OTHER (SPECIFY TYPE) AMOUNT (Specify Units) 0.00 % SULFUR 0.00 % ASH J.L 4.22=HXCY

'R5609 8/83

# dinstructions (inverse Side

AQ- 30 EQUIPMENT IDENT FICATION

**ESTABLISHMENT** NUMBER

**B3716** 

DNR USE ONLY - INITIALS, DATE

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DD NOT DUPLICATE 1983 COMPUTER PRINTED INFORMATION IF CORRECT FOR 1984 ENTER ONLY CORRECTIONS OR ADDITIONS.

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NEW	CHANGE	DELETE	D.K.
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ITEM		1983 DATA	. 1984 DATA
11 EM		mation currently in our files. e in filling out the form.	Report data for the 1984 calendar year. If this equipmen was never operated during 1984 and is permanently disco tinued then check this box
ITEM 2	A. SOURCE IDENTIFICATION 013	NUMBER PERMIT NO. 00000000	SOURCE ID. NO. PERMIT NO. (INCLUDE DASH)
EQUIPMENT	B. EQUIPMENT NAME OR DES	SCRIPTION TUBE LINE PRINTER	
DESCRIPTION	C. EQUIPMENT CODE (SEE TA	METHODS ) 1131	
ı	D. TOTAL NUMBER OF IDENT (IF OTHER THAN ONE,SEE		LJ(121)
	E. OPERATING SCHEDULE (YE	ARLY AVERAGEI DURS/DAY 242 DAYS/YEAR	HOURS/DAY LL DAYS/YEAR
	F. OPERATING SCHEDULE (PE	RCENT BY QUARTERI	JAN-MAR APR-JUN JUL-SEP OCT-DEC
UNIT CODES	JAN-MAR APR- 25 % 2	JUN JUL-SEP OCT-DEC 5 % 25 %	<u> </u>
ITEMS G. AND H. 1 POUNDS	G. RATED CAPACITY (PER HO AMOUNT	UNIT CODE	AMOUNT UNIT CODE
2 TONS 3 1000 CU. FT.	0.00	0	
4 CU YARDS 5 GALLONS	H. MATERIAL PROCESSED (PE TOTAL AMOUN		TOTAL AMOUNT UNIT CODE
6 1000 BARRELS 7 MILLION BTU	100.0	·	<u> </u>
	I. EMISSION CONTROL EQUIP	PMENT CODES (SEE TABLE IV)	
	J. AVERAGE OVERALL PARTIE EFFICIENCY, IF KNOWN	CULATE COLLECTION 0.00	اللالا
		ILE ORGANIC COMPOUND CONTENT IS OPERATIONS ONLY (SEE TABLE V, AND 1045-1142)	٠ــــ ٠ـــــ *
ITEM 3	A. NATURAL GAS	0 1000 CUBIC FEET/YEAR	1000 CUBIC FEET/YEAR
	B. DISTILLATE OIL NO. 1 THRU NO. 4	O 1000 GALLONS/YEAR	1000 GALLONS/YEAR
TO OPERATE		0.00 % SULFUR	₩
EQUIPMENT IN ITEM 2	C. RESIDUAL OIL NO. 5 AND NO. 6	O 1000 GALLONS/YEAR	1000 GALLONS/YEAR
		0.00 % SULFUR	٠٠
DO NOT USE	D. WOOD OR BARK	O TONS/YEAR	LIII TONS/YEAR
DECIMALS IN FUEL QUANTITIES	E. COAL OR COKE	O TONS/YEAR	LIII TONS/YEAR
COMMITTES		0.00 %SULFUR	LJ.LJ%
		0.00 %ASH	·
	F. OTHER (SPECIFY TYPE)	0 AMOUNT (Specify Units)	
		0.00 % SULFUR	«لـــا» ا
		0.00 % ASH	LLJ.*
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DEPARTMENT OF NATURAL _SOURCES	COMPLAINT RECEIVED	NESHAP
AIR QUALITY DIVISION	PERMIT ACTION	NSPS
ACTIVITY REPORT	ANNUAL COMPLIANCE INVESTIGATION COMPLETED	REVISED STATUS

AQ-42	COMPLETED			
(Sheet #1 of 2)	•	ı	DATE MM/DI	0/YY 8-84
ESTABLISHMENT	NO.		QUARTER	NO.
LTV STEEL COMPANY (formerly Republic Stee			l	04
965 Wanda Ave.	city Fernda	le l	D. Yahochi	No. 68
CONTACT	TITLE	inoon	COUNTY	NO.
Jesse Fulton PRIMARY ACTIVITY	Plant Eng	meer	DISTRICT	NO.
Tube Manufacturer			Northvill	le 03
Performed annual inspection at Republic	Steel Corp. with	1 MAJOR	PROJECT	
Maki. On June 30, 1984 the company name	was changed to	2 MINOR S	SOURCE	:L
LTV Steel Company, by a merger. Neither	management nor 0	5 TRAINI		
operations at the plant have been affect	ed by this change o	)7 )8		
This plant is quite old. Most production	n equipment was	9		
	'	O	(explain)	
installed in 1959 and is exempt from Par	t 2 Rules. Only		ACTION	TYPE NO.
1 permit (#353-84) for a lime silo with	baghouse control o	1 EMISSIO	N POINTS	TYPE NO.
is affected by this change in ownership.	This system o	INVESTI 2 VISIBLE	EMISSION	
was inspected for P/O as a part of this		EVALUA		
	0	4 SOURCE		
no compliance problem noted. I will inf		COMP) GRABS		
of the need to request reissuance of thi	- <del></del>  •	•	ES TAKEN	
The main thrust of this inspection invol	ved the company sl	)9 10		<del>-   .</del>
program for compliance with Rule 621 for	their 2 tube	1	<del></del>	<u></u>
interior coating operations. These line		3	<del></del>	
<del></del>	1	i4 i5		
lances to coat the interior of 10' secti		6		
rolled formed & seam welded steel tubes	: & conduit	17 <u></u> 18 <u></u>		<del></del>
The coating provides corrosion resistance		O OTHER	(explain)	
friction when pulling wires through the	conduit. Appear-	COMPL	IANCE STATUS	
ance is not a factor. The company has p	performed produc-		WN COMPLIANC	_
			COMPLIANCE I SCHEDULE	NOT .
tion tests & is ready to switch to water		-	HEDULE MEET	ING
which comply with the Rule. Two accept	able products	E, ON'A SC	CHEDULE, NOT	
have been tested. One developed by Wyar	ndotte Paint	F. ON A SC	ING INCREMENT CHEDULE, NOT	IS
Products, the other by Gage Paint Prod.	Once this		N IF MEETING MENTS	
				DECAG

### DEPARTMENT OF NATURAL \_SOURCES AIR QUALITY DIVISION

#### **ACTIVITY REPORT**

	RECEIVED	NESHAP
	PERMIT ACTION	NSPS
X	ANNU'AL COMPLIANCE INVESTIGATION COMPLETED	REVISED STATUS

AQ-42				- 7. 1	
(Sheet #2 of 2)			DATE MM/DI	8-84	
ESTABLISHMENT	NO.	<del></del>	QUARTER		NO.
LTV Steel Company (formerly Republic Steel Corp.	) B-37	716		1	04
NUMBER AND STREET	Ferno	dale	D. Yanochi		68
CONTACT	TITLE		COUNTY		NO.
PRIMARY ACTIVITY	<u></u>		Oak land		63 T
THE STATE OF THE S			Northvill		03
REMARKS:	-	1	PROJECT		
paint change is incorporated into a permit, we can	<u>n conside</u>	01 MAJO	R SOURCE		'
the company to be in compliance with Rule 621. T	he prob-	02 MINOI 03. RESID	R SOURCE	•	
		04 MEET	ING – CONFEREN	ICE	
<u>lems</u> encountered by the company during testing of	water	05 TRAIN	NIŅG		•
based products involved lengthy curing times & ad	equately	07 08			
drying the washed & galvanized tubes prior to coa	ting appl	09 —— 10			
cation. They also encountered problems with the			R (explain)		
,		SURV	EY ACTION	TYPE	NO.
which regulated paint flow to the lances. Water	<u>based</u>		SION POINTS		
paints caused this electric valve to stick in the	open	1	LE EMISSION UATION		
(spray) position after 2 hrs. of painting. The c	ompany		CE TEST (STAFF)		
has switched this valve to a needle valve which n	eeds to		CE TEST MPANY)	-	
be rebuilt every 2 weeks.		1 -	SAMPLE . BRES TAKEN	$\vdash \vdash$	
Only the small diameter tube coating line was in	operation	<sup>'09</sup>			
during the inspection. The system utilizes press	ure	11			
atomization 1,000 PSI (1200 PSI is used for appli	cation	13'			_
of the water based coatings). The drying oven te		15			
		16 17			
at 150°F. Drying temperatures this low (below 19 would qualify the company for 3.5 lbs. VOC per ga	-	18			
would qualify the company for 5.5 lbs. voc per gu	<del></del>		R' (explain)		·
emission limit for air dried coatings in Section	1(b) of		PLIANCE STATUS MPLI'ANGE	[	
Rule 621 as opposed to the 3.0 limit in Section 1(e).			IOWN COMPLIANCE		
I will follow up with the company in writing, requesting			A SCHEDULE SCHEDULE MEET	ING	
that the company submit a permit application for the coat-			REMENTS SCHEDULE, NOT	•	·
ing change on the 2 interior coating lines & that the			ETING INCREMEN SCHEDULE, NOT	TS	
company request reissuance of P/I 353-84 under the new			OWN IF MEETING REMENTS.		

PROG. G/6	29/55	, REPORT C	F ANNUAL INVEST	1GATIONS		PAGE	1150
DEPT. OF N	NATURAL RESOURCES ITY DIVISION IC STEEL CORP	) (a. 65 of Jine 3			,	PRODUCED 02/2	<b>2/8</b> 4
DEDI IDL	is execusion it V 318.00	DISTRICT NO 02		n:		4.40	
REPUBL	IC STEEL CORP	DISTRICT NO. US	STAFF	Yacho		NO. 63	_
IODOCA	R PRODUCTS GROUP 5 WANDA AVE	COUNTY 63 OAKLAND				<u>/</u> /	• !
FERNDÁI	LÉ 48 <u>22</u> 0	ESTAB. NO. B3716	CONTACT .	lesse Fulton		DATE 10/19/9/	
JESSE 1	/ FULTON JR	313 3981600 .	36				
BILLED	FOR SCHEDULED INVESTIGAT	ION .	TOTAL TIME.	HOURS	PROJECTED TIME.	HOURS	5
·			•		•		
	ECODE SOURCE NAME	PIECES AVGHOL	IDI V-DATE	CONTROLS		ESTIMATED EMISSID PART. T/Y SO2 T	_
FQY SID	ECODE SOURCE NAME	PIĘCES AVGHUC	KEY-KATE .	CONTROLS	, Leve -	MRI. 171 _302 1	,
001	OO18 EMT BOILER 7.2 MMB		7.20 MMBT 5.20 MMBT		_	. 07	
; 002 003	0018 PAINT HOUSE BOILER	1	.31 MMBT			.01	•
004	0018 OFFICE BUILER 0.48	à .	.48 MMBT TONS		•	.02	
00.5 006	1085 SPRAY BOOTHS	/ colyanize 2	.26 GALS , FAB-	FILTR	95.00	. <b>ọ</b> 3	
00.5 007 00.5 008		4	I.OO GALS		Pipe locuer	acting	
009	0560 WOOD SAW	1	TONS FAB-	FILTR	- no lacuar	المراجع	
00.5 010 011	1085 PIPE COATER -	3./	.13 LBS.	FILIR	Y'Y		
01.0 012 00.5 013	0426 LIME HOPPER 1131 TUBE LINE PRINTER	/ !	TÔNS OR GALS	-2412°	· .	2	
014	0070 DRYING DVENS	2	100	(7)	COCA (11) 100	les.	
	A DAD-10 , KAL	•	Jens Wil.	Janes John	No in lotte		X
• •	Add and Evale		Moral Facelin	7 Magne	all victor	+ . Ju	المشو
1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	Uni Du Mais	$\omega$	valve re	الموالي مرارات المالي	سردی کر	1 5"	
	1350 5 11000		10.50	Post / Patry	(200)	1.0	
•	Endn dall.	14/1/5	1,000	-165 W	- · <i>y</i>	op vo)	
	Add AD-10 EVALE FORM	was electricismos senting in the read of t	1001	1 2	1 5	11 .	الم ا
	·	Was weakly 151	an cother	1, me allos	1 vert	3	4/-6
		my harden	1v1)	ra fr. of Book	( 4	1.	<i>(</i> 67)
		South Milk	م م	I my 2000		نها الن	L-
		11 px 12. 3. 12	CO XIVE	Total.		المهر حس	180
Ċ		" ANG.	J' The	~ , v~ , v. ·		Line andit	10.15
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		•			al	all Production of last	
		• •			الم هري	Julie of	

#### Product Data Sheet

Product Name:

Gray Water Borne Conduit

Pipe Coating

Product Code:

11ALW-41059A

Date:

October 3, 1984

Prepared For:

LTV Steel

Product Application:

Spray

**Product Color:** 

Gray

**Product Description** 

V.O.C. = 1.65

Flashpoint 132°F (c.c)

**Physical Properties** 

pH: 9.2 ± .?

Wt/Gal.:

9.16 ± .1

Viscosity:

28.2

Type Viscometer:

#2 Zahn

Temperature:

77°F ± 5

Crypt: 15 ± 1

Conductivity:

Coverage

Theor. Solids by Wt%:

25.8 ±1

Theor. Solids by Vol%:

18 1 1

Theor. Coverage:

288.72

(Sq. Ft./Gal. @ 1 Mil)

**Application Characteristics** 

Application:

Spray

Applied Viscosity:

28 ± 2

#2 Zahn

Amount & Type of Reducer: Water as needed

Dry Film Thickness: .5 ± .2

Dry Schedule:

Flash Time: 1 - 2 minutes

Bake Time and Temperature:

4 - 5 @ 140°F

Clean Up Thinner:

Water

**Environmental Characteristics** 

Exempt —

xx ves

no

Hazardous Materials:

Material safety data sheet available

upon request.

SECTION I

MANUFACTURES NAME:

KZO COATINGS WYANDOTTE PAINT

STREET ADDRESS:

650 STEPHENSON HWY. TROY, MI 48084

EMERGENCY TELEPHONE NO.:

(313) 589-3660

PRODUCT CLASS: Water Borne Coating

MANUFACTURES CODE INDENTIFICATION: 11BLW41059A

TRADE NAME:

GRAY W.B. CONDUIT PIPE COAT

#### SECTION II - HAZARDOUS INGREDIENTS

·		TĻ.V	VAPC
HAZARDOUS INGREDIENTS:	* PCT *	PPM MG/M3 *	LEL *PRES
	#BY WT#	# #	• #
AMMONIA	* <.5*	25.00* 18.00*	16.0# 584
BUTYL CELLOSOLVE	* <5* SKIN	25.00# 120.00#	1.1#
GLYCOL	* <.5*	50.00* 125.00*	3. 2*<
ISOPROPYL ALCOHOL	# <.5#	400.00# 980.00#	2.0# 33
STRONTIUM CHROMATE	* <5*	* .05*	NA * N
XYL.OL.	. * <.5* SKIN	100.00* 435.00*	1.0* 5

#### SECTION III - PHYSICAL DATA

BOILING KANGE:

212 - 343, DEG. F

VAPOR DENSITY VS. AIR: LIGHTER THAN AIR

EVAPORATION RATE VS. ETHER: SLOWER

F CENT VOLATILE BY VOLUME: 82.1

WEIGHT PER GALLON: 9.17 LBS.

#### SECTION IV - FIRE AND EXPLOSION HAZARD DATA

DOT CATEGORY:

FLASH POINT:

LEL: SEE SECTION 1

AINT.

COMBUSTIBLE LIQUID, UN-1263 192F SFCC

EXTINGUISHING MEDIA:

FOAM, CARBON DIOXIDE, DRY CHEMICALS

UNUSUAL FIRE AND EXPLOSION HAZARDS:

THIS PRODUCT HAS A FLASH POINT IN A TAG CLOSED CUP, BUT DOES NOT SUPPORT COMBUSTION, CLOSED CONTAINERS MAY BURST (DUE TO BUILD UP OF STEAM PRESSURE), WHEN EXPOSED TO EXTREME HEAT.

SPECIAL FIRE FIGHTING PROCEDURES:

TO PREVENT PRESSURE BUILD UP, WATER SHOULD BE USED TO COOL CONTAINERS EXPOSED FIRE.

#### SECTION V - HEALTH HAZARD DATA

THRESHOLD LIMIT VALUE: SEE SECTION II.

EFFECTS OF OVEREXPOSURE:

INHALATION: HEADACHE, NAUSEA, IMPAIRMENT OF REACTION TIME AND COORDINATION.

SKIN CONTACT: REPEATED CONTACT MAY CAUSE IRRITATION.

EYE CONTACT: CAUSES IRRITATION AND POSSIBLE DAMAGE.

EMERGENCY AND FIRST AID PROCEDURES: .

INHALATION: MOVE TO FRESH AIR, GIVE ARTIFICIAL RESPIRATION, IF NECESSARY.

KIN CONTACT: WASH WITH SOAP AND WATER.

EYE CONTACT: FLUSH WITH WATER FOR AT LEAST 15 MINUTES. CONSULT A PHYSICIAN.

#### SECTION VI - REACTIVITY DATA

STABILITY: . STABLE

CONDITIONS TO AVOID:

INCOMPATABILITY (MATERIALS TO AVOID):

N/A

HAZARDOUS DECOMPOSITION PRODUCTS:

CARBON MONOXIDE, CARBON DIOXIDE, SMOKE, OXIDES OF NITROGEN.

HAZARDOUS POLYMERIZATION:

WILL NOT OCCUR

CONDITIONS TO AVOID:

N. A.

#### SECTION VII - SPILL OR LEAK PROCEDURES

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED: ENTILATE AREA AND REMOVE WITH INERT ABSORBENT.

#### WASTE DISPOSAL METHOD:

INCINERATE IN APPROVED FACILITY. DO NOT INCINERATE CLOSED CONTAINERS. DISPOS OF IN ACCORDANCE WITH FEDERAL, STATE, AND LOCAL POLLUTION CONTROL REQUIREMENTS

#### SECTION VIII - SPECIAL PROTECTION INFORMATION

#### RESPIRATORY PROTECTION:

USE ADEQUATE VENTILATION. IN CONFINED AREAS USE U.S. BUREAU OF MINES APPROVED RESPIRATOR DEVISE.

#### VENTILATION:

PROVIDE SUFFICIENT VENTILATION TO KEEP VAPOR CONCENTRATION BELOW THE GIVEN TLV

#### PROTECTIVE GLOVES:

REQUIRED FOR PROLONGED OR REPEATED CONTACT.

#### EYE PROTECTION:

USE SAFETY EYEWEAR DESIGNED TO PROTECT AGAINST SPLASH OF LIQUIDS.

#### OTHER PROTECTIVE EQUIPMENT:

TYE BATH AND SHOWER SHOULD BE AVAILABLE

#### SECTION IX - SPECIAL PRECAUTIONS

PRECAUTIONS TO BE TAKEN IN HANDLING AND STURING:
DO NOT STORE IN HIGH TEMPERATURE AREA. PROTECT FROM FREEZING.

#### OTHER PRECAUTIONS:

DO NOT TAKE INTERNALLY, AVOID PROLONGED CONTACT WITH SKIN.
CONTAINS CHROMATE PIGMENTS. IF SUBJECT TO SPRAY APPLICATION, ENGINEERING AND
ADMINISTRATIVE CONTROLS MUST BE INSTITUTED TO MAINTAIN AN EXPOSURE BELOW 0.1 MM
MS. IF THESE CONTROLS ARE NOT ADQUATE, THE USE OF A RESPIRATOR IS RECOMMENDED.

APPROVED BY HEALTH & SAFETY DEPARTMENT:

NAME: Barry Kamash

DATE: 10/03/84

FORMULA REV. DATE 82784

# DEPARTMENT OF NATURAL F. URCES AIR QUALITY DIVISION

# **ACTIVITY REPORT**

COMPLAINT RECEIVED	NESHAP
PERMIT	NSPS
ANNUAL COMPLIANCE INVESTIGATION	REVISED STATUS

' L	COMPLETED	لـــا	STATUS		
AQ-42	,	•	DATE MM/DD	/YY	
•	•		4-16		1
ESTABLISHMENT	NO.		QUARTER		NO.
Republic Steel Corp.	B	-3716			2
NUMBER AND STREET	CITY'		STAFF		NO.
965 Wenda Ave.			LOPEZ		
CONTACT	THT LE		COUNTY		NO.
PRIMARY ACTIVITY			DAKLAN		(63 NO.
FRIMARY ACTIVITY	•		Pontio		3
REMARKS:		<del></del>	PROJECT	_	
		<del></del>	SOURCE		i ·
		02 MINOR		4	
I spoke to Mr. Jul	for	03. RESIDE	=		
	. /	1	IG – CONFEREN	CE	1
roday about his sermits.	He	05 TRAINI	NG		
The state of the s	4.	07			
Will be sending I ken	n in.	08			<u> </u>
This week		09			
The week	_ <del> </del>	10	ft-i-\		
. I also gave lin	a	00 OTHER	· · ·	· 	
verbal D.K. To ske	1 76-	<del></del>	Y ACTION ON POINTS	TYPE	NO.
			IGATED		
permit on the two	<u>·</u>	02 VISIBLE			
drying overs since	, non		E TEST (STAFF)		<del>                                     </del>
	1	04 SOURCE		ı	
are Used only for a	siving		PANY		
by whole a day	الكل مدندا	05 GRAB S	AMPLE ES TAKEN		
10		06 PICTUR	ES TAKEN		
fy natural ops	ges	10			
rule 28/ sec. d.)		11			
	•	13			
<del></del>	<del></del>	14			—- j
		15			<del></del>
		16			<del></del>
	•	17			
		19			
		00: OTHER	(explain)		
			IANCE STATUS		
<del></del>	<del></del>	A. IN COM			$\sqsubseteq \dashv$
•			OWN COMPLIANCE		
	<del></del>		F COMPLIANCE N SCHEDULE	.01	
			CHEDULE MEET	NG <sup>.</sup>	
			EMENTS .		.
	450	4	CHEDULE, NOT		
		1.	ING INCREMEN	TS _	<b>~</b>
<del></del>			CHEDULE, NOT	La	ا (ر
			NN IF MEETING EMENTS	٧	

STATE OF MICHIGAN



NATURAL RESOURCES COMMISSION THOMAS J. ANDERSON E. R. CAROLLO JACOB A. HOEFER STEPHEN F. MONSMA HILARY F. SNELL PAUL H. WENDLER HARRY H. WHITELEY

JAMES J. BLANCHARD, Governor

# **DEPARTMENT OF NATURAL RESOURCES**

RONALD O. SKOOG. Director

2455 N. Williams Lake Road Pontiac, Michigan 48054

March 6, 1984

Republic Steel Corporation 965 Wanda Avenue Ferndale, Michigan 48220

Attention: Mr. Jessie Fulton

Dear Mr. Fulton:

On January 3, 1984 I sent you four permit applications to be completed and submitted to our Lansing office. These applications were to cover the following equipment located in your plant:

- (1) three tube welders no permit nec -installed before
- (2) one lime hopper.
- (3) one tube line printer-no permit nec-installed before
- (4) two drying ovens no permit nec-only drives off

To date, these applications have not been received. If you have not filled them out and sent them in, please do so by April 1, 1984.

Thank you very much.

If you have any questions or if we can be of any assistance to you, please feel free to contact this office.

Sincerely.

Sandra C. Lopez
Resource Specialist

Air Quality Division

(313) 666-2700

SCL:mh



HATURAL RESOURCES COMMISSION GOMAS J. AMDERSON F R CAROLLO IACOR A HOFFER STEPHEN F MONSMA CREATE L STREET PAUL H WENDLER HARRY H WHITELEY

#### JAMES J. BLANCHARD, Governor

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## **DEPARTMENT OF NATURAL RESOURCES**

RONALD O SKOOG, Director

2455 N. Williams Lake Road Pontiac, Michigan 48054

January 3, 1984

Republic Steel Corporation 965 Wanda Avenue Ferndale, Michigan 48220

Attention: Mr. Jessie Fulton

Dear Mr. Fulton:

On December 2, 1983 I conducted a routine annual compliance investigation of your plant. Also at that time, Dave Yanochko and I discussed your plans for coming into compliance with Rule 621. You will be hearing from Mr. Yanochko soon regarding your plans for coming into compliance.

My annual inspection included a complete tour of your plant, at which time I inspected the boilers, naptha tank, painting and plating operations, wood saw, and pipe coater. All of this equipment was in working order and appeared to have been well maintained.

During my inspection I noticed the following pieces of equipment which have not been listed on our emission inventory forms in the past.

- Tube welders (three)
- (2) Lime hopper
- (3) Tube line printer
- Drying ovens (two)

You will need permits for this equipment, I have enclosed applications for your use. Please submit the completed applications to the address at the top of the form within 30 days.

Thank you for your time and cooperation. If you have any questions or if we can be of any assistance to you, please fee! free to contact this office.

Sincerely.

Resource Specialist Air Quality Division

Denilia Jos

(313) 666-2700

SCL:mh **Enclosures** 

Company	ABRUBLIC STEEL CORPUNATION
ADDRES	S 905 WANDA AVRILLED TO THE STATE OF THE STA
	shment #
	T TO ANY OF PART 6 BULES? I YES
RULES	Lal
PROCES	S COURTE DIE LAMPE AND BRALL PERFENDENCE METALLIN TELEVISION I 1972
	ED COMPLIANCE DATE IN RULE
DATE C	COMPLIANCE WAS / WILL BE ACHIEVED
	TED 1979 EMISSIONS TPY VOC
	COMPLIANCE IS ACHIEVEDTPY VOC
CALCU	LATIONS:
• •	Strings and Large
	PRINCIPAL STATES STATES STATES AND A STATES STATES OF ST
	Saloon and to sale that there is a second to the sale of the sale
	SOURCE SIO PIPE COATING LINE
	1983 former of 1800 Box Comprisered and the 21 VOC 8
	1500 get y 3.5 lbs Vor y 1 hon . 3 by 1000 get
	T

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...

# **Republic**steel

Republic Steel Corporation Steel and Tubes Division Detroit Plant 965 Wanda Avenue Ferndale MI 48220 Tel 313/398-1600

December 16, 1983

Ms. Sandra Lopez Environmental Engineer Michigan Department of Natural Resources 2455 N. Williams Lake Rd. Pontiac, Mi. 48054

VOC Emission Compliance

Dear Ms. Lopez

For the past several months, this plant has experimented with products of three paint suppliers with the objective of replacing the solvent-based paint used on our inside diameter coating line with a suitable water borne paint. Our latest test, conducted on December 14, 1983, was successful from the standpoint of applicability, but we need to investigate further the aspects of suitability for intended use, and longer term problems of application. As a result, we find it necessary to at this time request a six month extension of the compliance date for Rule R336.1621.

The paint used in this application is not simply an "appearance" factor in our final product. The paint must meet standards set by Underwriters Laboratory in their specification for Electrical Metallic Tubing. In addition, the paint must meet Republic Steel standards as to "slipperyness," in regard to the relative ease of pulling wire through the tubing.

We expect to qualify one or more of these products and plan to begin using it immediately thereafter. An extension will allow us to continue a methodical approach to a significant change in our production process.

Your favorable action in this matter will be greatly appreciated.

Jesse Fulton

Plant Engineer

W. Kasyon

# DEPARTMENT OF NATURAL h\_sources AIR QUALITY DIVISION

COMPLAINT RECEIVED	NESHAP
PERMIT ACTION	NSPS
ANNUAL COMPLIANCE INVESTIGATION	REVISEI STATUS

X  INVE	JAL COMPLIA STIGATION	ŅCE		REVISED STATUS		
-Page 1⊢	LETED			314103		•
110 42				DATE MM/DE		$\Box$
COT A DI LOUIS NA	luo			12-2		
ESTABLISHMENT REPUBLIC Steel Corporation	NO. B-3716			QUARTER -	1	NO. 04
NUMBER AND STREET	CITY			STAFF		NO.
965 Wanda Avenue	Ferndale	<u> </u>		Lopez	50	
CONTACT	TITLE			COUNTY		NO.
Jessie Fulton	L			Oakland DISTRICT		63 No.
Conduit and Tubing Manufacture	•		,	Pontiac		.03
REMARKS:			F	PROJECT		
(With Dave Yanochko) This is the first time a	anyone	01	MAJOR S			
from Air Quality Division has been to this compar	ny. Their	02	MINOR S	105	And	, ,
		03		G - CONFEREN	(一) (^. CE	٠ - ١
<u>only products are tubes and conduits. At the time</u>	<u>ne we wer</u> e	05	TRAININ	VG (F1')	11	1
thoma thou word testing a new paint from Gago Dr	roducts	07			(.4	
<u>there, they were testing a new paint from Gage Pr</u>	Duuc LS_	108				[
to see if it would work to bring them into compli	ance	10				
with Dule 621 They been tecting prints for		00	OTHER	lexplain)		
with Rule 621. They have been testing paints fro	)III	-	SURVEY	ACTION	TYPE	NO.
Wyandotte Chemical, Gage Products and Mahoney Pai	int in	01		N POINTS		
			INVEST	GATED		{
Youngstown to find a water base paint they could	use.	02	VISIBLE EVALUA	EMISSION TION	1	
The paint the insides of their tubes so that elec	ctrical	03 <sup>-</sup>	SOURCE	TEST (STÄFF)		
<u>lines can slide through more easily.</u> The problem	n they_		(COMP	ANY)	<del>`</del> -	
<u>have been having is that the water base paints ev</u>	vaporate	05 06	GRAB SA	AMPLE ES TAKEN	1	{
		09				
so slowly that the metal of the tubes has been ru	<u>usting</u>	10		<del>  </del>		
_before the paint dries. The paint being tested 1	from	11 12				
METOTO DITE PATTIE OF THE PATTIE DE TING DESCES I		13				
Gage Products while we were there did not look li	ike it	· 14				
would work either because it was drying too slow	ا ماسا با	15				
WOOTH WOLK EITHEL DECAUSE IL WAS GIVING LOO STON	Ly. HE_	16				
<u>suggested several changes such as using dry heat</u>	to dry	18		<u> </u>		
the paint rather than wet heat, and they will kee	ep working	19 100	OTHER	(explain)		
,				IANCE STATUS		
on it. They will apply for an extension of their Rule				PLIANCE	1	
621 deadline.		B.	-	WN COMPLIANC COMPLIANCE N		- 1
	<del></del>	C.	-	COMPLIANCE N	101	
The plant covers 280,000 sq. ft. They are ope	erating	D.	-	HEDULE MEET	ING	- 1
three shifts. The conduit tube they make comes	in eleven	.E.		MENTS HEDULE, NOT	·.	.
	· :	-		ING INCREMEN	-	_
sizes, ranging from 1/2" to 4" generally. The bi	iggest	F.		HEDULE, NOT	(1	ا(ربر

tube they make is 6-5/8" in diameter, with a 1/4" wall.

INCREMENTS

# DEPARTMENT OF NATURAL L\_JOURCES AIR QUALITY DIVISION

COMPLAINT RECEIVED	NESHAP
PERMIT ACTION	NSPS
ANNUAL COMPLIANCE INVESTIGATION	REVISED STATUS

	AL COMPLIA	NCE	REVISED		
	LETED		STATUS		
			DATE MM/DD	/Y Y	٦
ESTABLISHMENT	NO		QUARTER	NO	_
Republic Steel Corporation	B-3716			04	_
NUMBER AND STREET 965 Wanda Avenue	сіту . Ferndalie	2	STAFF	NO	٠
	TITLE	<u>-</u>	COUNTY	NÓ	
Jessie Fulton			Oakland DISTRICT	63	_
Conduit and Tubing Manufacture			Pontiac	03	
REMARKS:			PROJECT		_
They use all carbon steel to make their tubes. T	he tubes	01	MAJOR SOURCE		_
are cold shaped. There are two lines through the	plant.	02	MINOR SOURCE RESIDENCE		
		04	MEETING - CONFERENCE	CE	l
Their boilers all appeared to be in good repai	r. The	05	TRAINING		
EMT boiler (SID 001) is used for process heat. I	t is gas	07 08			-
		09		·	_
fired. The LEMT boiler (SID 002) is also gas fir	ed and_	10			-
used for process heat, however, it is only a stan	dby	00	OTHER (explain)	ı	_]
			SURVEY ACTION	TYPE NO	<b>)</b> .
boiler and only runs a few weeks a year. The pai	<u>nt nous</u> e	.01	EMISSION POINTS INVESTIGATED	•	
boiler (SID 003) is also a gas boiler. However,	02	VISIBLE EMISSION EVALUATION		7	
used to heat the paint house. The office boiler	(SID 004)	103 -04	SOURCE TEST (STAFF)		╗
is also gas fired and is also used for heating.			(COMPANY)		ヿ
The naptha tank (SID 005) is a 5,000 gallon ta	nk which	·05 ·06	GRAB SAMPLE PICTURES TAKEN		$\dashv$
is underground. The naptha tank will go when the	y transfe	09 <b>Υ</b> ο			╗
to a water base paint. They use the naptha for d	liluting	11	<del></del>		$\dashv$
		13			_
their paints. The zinc plating tanks (SID 007) a	no the	14			-
acid pickling tanks (SID 008) are not heated. Th	e acid	16			_
used is 20% Hase the base used is NAOH There	ic a	17		·	-
used is 30% H <sub>2</sub> Sn <sub>4</sub> , the base used is NAOH. There	13 α	18			-
direct exhaust to the atmosphere from the acid pi	ckling_	00	OTHER (explain)		긕
tanks. The stacks from the caustic and acid tank	s have	A.	IN COMPLIANCE	<u>·</u>	
	<u>J Huve</u>	В.	ÜNKNOWN COMPLIANC	<b>⊑</b>	┪
to be replaced occasionally. One stack was repla	ced	C.	OUT OF COMPLIANCE N	тот	
4 years ago, the other stack will be replaced soo	n,	D.	ON A SCHEDULE ON A SCHEDULE MEETI	NG	٠
			INCREMENTS		ا ج
probably within the next year. The wood saw (SID	•		ON A SCHEDULE, NOT MEETING INCREMENT	rs ji 🦠	. }
<u>is just a small table saw with a small bag attach</u>	ed to it	F.	ON A SCHEDULE, NOT KNOWN IF MEETING		
to collect the sawdust. The had is manually dumn	ed into	<u>'</u>	INCREMENTS		- 1

# • DEPARTMENT OF NATURAL ALJOURCES AIR QUALITY DIVISION

# ACTIVITY REPORT

COMPLAINT RECEIVED	NESHAP
PERMIT ACTION	NSPS
ANNUAL COMPLIANCE INVESTIGATION	REVISED STATUS

AQ-42 -Page 3-	LETTED		STATUS		
· · · · · · · · · · · · · · · · · · ·			DATE MM/D	D/YY	
ESTABLISHMENT	NO.		QUARTER	,	NO.
Republic Steel Corporation	B-3716			·	04
1	CITY		STAFF		NO.
965 Wanda Avenue	<u>Ferndale</u>	<del>-</del>	Lopez		NO.
Jessie Fulton			Oak kand	,	63_
PRIMARY ACTIVITY			DISTRICT		NO.
Conduit and Tubing Manufacture REMARKS:			Pontiac PROJECT		<u>103</u>
the trash. The pipe coater (SID 010) only runs 3	-4 weeks	01	MAJOR SOURCE		١.
		02	MINOR SOURCE		
<u>a year. It sprays varnish, mineral spirits and t</u>	<u>oluene.</u>	03	RESIDENCE	•	
It has fabric filters which are changed regularly	,	:04 :05	MEETING CONFERENT TRAINING	NCE	
AL TIME TUDITY TITLES S WITTER UTE CHANGES TEGUTALTY		105 107	TRAINING		
The two lines are for different size tubes, ho	wever,	80			
<u>they both run the same. Each line starts off by</u>	cold	:09			
they both run the same. Lach title starts of by	COIU	10 00	OTHER (explain)		
<u>shaping the tube and then welding them electrical</u>	ly.	-			
Welders (there are 3 of them altogether) use a wa	ter and	01	EMISSION POINTS	TYPE	NO.
<u>oil emulsion to cool them. There are smog-hogs t</u>	n deal	02	INVESTIGATED VISIBLE EMISSION	-	
There are no purmits for		02	EVALUATION		
<u>with some of the fumes. They are not permitted s</u>		03	SOURCE TEST (STAFF)		
<u>I will send them a permit application for these.</u>		04	SOURCE TEST (COMPANY)		
The state and a second de after add minist		05	GRAB SAMPLE	<b></b>	<u> </u>
Then, the tubes are cleaned in the acid pickli	<u>ng tank</u> s	06 09	PICTURES TAKEN	] '	'
and then they are zinc plated. Following that, t	hey are	10			,
	05	11		` <b></b>	_
sent through the drying ovens to dry at about 435	<u> </u>	12 13			<del></del> ,
There are no permits on the drying ovens either.	Waste_	14			
		15			
heat fromthe drying ovens goes to the paint line,	rom	16			<del></del>
<u>there it goes outside after going through paper f</u>	ilters	17 18			
	-	19			
to collect any paint. The paint oven is about 10	0 teet	00	OTHER (explain)		Ι
<u>long</u> and has two outside vents. There are filter	pads	A.	IN COMPLIANCE STATUS		İ
		В.	UNKNOWN COMPLIAN	CE .	
<u>between the prepaint vent and the roof. These ar</u>	<u>'e</u>	C.		NOT	
changed once a day. After painting, the tubes ar	e sent_	D.	ON A SCHEDULE MEET	FING	;
through a tube line printer which uses Polysolva	VE ink.	F	INCREMENTS ON A SCHEDULE, NOT		
This is an alcohol based ink. That is another it	F.	MEETING INCREMEN	ITS :		
		۲.	KNOWN IF MEETING	••	: . !
will ask them to get a permit for.		į	INCREMENTS		

3/77

# DEPARTMENT OF NATURAL H. JOURGES AIR QUALITY DIVISION

# **ACTIVITY REPORT**

COMPLAINT RECEIVED	NESHAP
PERMIT	NSPS
ANNUAL COMPLIANCE INVESTIGATION	REVISED STATUS

-Page 4-	VESTIGATION OMPLETIED			ATUS		
AQ-42			D	ATE MM/DE	)/Y-Y	
ESTABLISHMENT	NO.		·	JARTER		NO.
Republic Steel Corporation	B-3716				1	04
NUMBER AND STREET	CITY		STAFF			NO.
965 Wanda Avenue	Ferndal	9		Lopez		
CONTACT	TITLE		C	DUNTY.		NO.
Jessie Fulton		-		Oakland		63_
PRIMARY ACTIVITY						
Conduit and Tubing Manufacture  BEMARKS:			PR	<u>Pontiac</u> DJECT		03
Outside there is a lime hopper with a baghou	ise which	01	MAJOR SO		<del>.</del>	
· · · · · · · · · · · · · · · · · · ·		02	MINOR SOL			
has an automatic shaker. This is another source	they will	03	RESIDENC	E .		
		04	MEETING -	- CONFEREN	CE	
need a permit for.			TRAINING			
All of the equipment I saw appeared to be we	all maintai:	07				
ATT OF THE EQUIPMENT I SAW appeared to be we	i i iiia ('I) Ld [ 1	09	·			
They were seriously working toward finding a wat	ter base	10	-			
		1	OTHER (ex	plain)		
paint to use for the insides of their tubes. The	ne sources	<u></u>				<u></u>
	·		SURVEY A	CTION	TYPE	NO.
that were not listed appear to have been missed	merely by	01	EMISSION I			
oversight.	•	02	VISIBLE EN			
		03	SOURCE TO	ST (STAFF)		
		04	SOURCE TI			
		05	GRAB SAM	PLE		
		06	PICTURES	TAKEN		
		09		<u> </u>		
<u> </u>		10				İ
		11		<del></del>		L
	<del></del>	12		-		
		14				
		15		<del> </del>		
	·	16				
		17				
		18		-		
		19 00	OTHER (ex	plain)		_
			COMPLIÀ	NCE STATUS		
· · · · · · · · · · · · · · · · · · ·		A.	IN COMPLI	ĄNCE		L
		В.		COMPLIANC		
	<del></del>	C.		MPLIANCE N	TOP	
			ON A SCH	HEDULE EDULE MEET	ING	
	•	٦.	INCREMI			:
	<u> </u>	E.		DULE, NOT		
		l		INCREMEN	٠	
		``		F MEETING		,

PAGE 1168

PRODUCED 03/24/83

REPUBLIC STEEL COR	₹P	DISTRICT NO. 03	·	•
REPUBLIC STEEL COR	₹P		STAFF	NO.
STEEL AND TUBES DE	IVISION	COUNTY 63 DAKLAND		
965 WANDA AVE				
FERNDALE	48220	ESTAB. NO. B3716	CONTACT See Contact	DATE
BENNER - ENROX		313 3981600		<u> </u>
Treese in the	•		TOTAL TIME, HOURS	DEG SECTED TIME HOURS
	•		IDIAL IIME, MUUKS	PROJECTED TIME, HOURS

PART. ESTIMATED EMISSIONS SOURCE NAME -----PIECES AVG. -HOURLY-RATE ECODE ----- CONTROLS -----% EFF PART. T/Y SO2 T/Y 7.20 MMBT .07 002 OO18 -LEMT BOILER ... 5.20 MMBT .34 MMBT .01 0018 PAINT HOUSE BOILER .48 MMBT 004 0018@OFFICE BOILER .02 0902 NAPHTHA TANK TONS 00.5 005 SPRAY BOOTHS - . ( 1. . 4 8.26 GALS 00.5 006 00.5 007 0074 ZINC PLATING TANKS GALS 0075 ACID PICKLING GALS 00.5 008 0560 WOOD SAW - . TONS 003 00.5 010 1085 PIPE COATER . 1.74 GALS .03

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1.1.

# 2455 N. Williams Lake Road Pontiac, Michigan-48054

March 22, 1983

Republic Steel Corporation Steel & Tubes Division 965 Wanda Avenue Ferndale, Michigan 48220

Attention: Mr. Dennis Lennox, Plant Engineer

Dear Mr. Lennox:

This is in regard to your letter dated March 17, 1983 concerning Michigan Air Pollution Control Commission Rule 621 which restricts the emissions of volatile organic compounds from miscellaneous metal parts coating operations.

The compliance program detailed in your letter appears to be acceptable. The only additional piece of information required by this office is the formulation of the water borne coating which you finally decide on. The coating's "Material Safety Data Siret" will usually contain the required information. Please submit a copy of the data sheet to this office when your decision is made.

Thank you for your attention to this matter.

Sincerely,

David M. Yanochko Environmental Engineer

Air (Vality Division

DMY: rah

cc: F. Rieth

# **Republic**steel

Republic Steel Corporation Steel and Tubes Division Detroit Plant 965 Wanda Avenue Ferndale MI 48220 Tel 313/398-1600

March 17, 1983

Mr. David M. Yanochko Air Quality Division Department of Natural Resources State of Michigan 2455 N. Williams Lake Rd. Pontiac, MI 48054

Dear Mr. Yanochko:

The following is our program for compliance of D.N.R. Rule R336.1621 governing emissions of volitile organic compounds:

- 1. The paint used for coating the inside diameter of both large and small sizes of electrical metallic tubing will be changed from a solvent-based material to a water-borne material. We are presently testing a number of products, but we have not decided on a specific formula. We intend to be in compliance by December 31, 1983.
- 2. The pipe coating line will continue to operate with the present solvent-based coating. Emission rate for this line is within the limits described in rule 621(8a).

If you require additional information, please contact me.

\_-Sincerely,

Dennis Lennox Plant Engineer

cc W. L. West

L. J. Synk

W. Kasyon

G. N. Krauss

JAN 1 0 1983

**Republic**steel

Republic Steel Corporation Steel and Tubes Division Detroit Plant 965 Wanda Avenue Ferndale MI 48220 Tel 313/398-1600 January 6, 1983

Mr. David M. Yanochko Air Quality Division Department of Natural Resources State of Michigan 2455 N. Williams Lake Road Pontiac, MI 48054

Dear Mr. Yanochko:

This letter is in response to your notice of new regulations restricting the emmission levels of volatile organic compounds.

Ferndale Plant presently operates three processing lines coating metal tubing. They are: 1. Large Electrical Metallic Tubing Line, 2. Small Electrical Metallic Tubing Line, and 3. Pipe Coating Line.

Estimated paint usage per year for the large and small metallic tubing lines combined is 32,000 gal. Organic solvent content is 65% with a solvent density of 6.27 lb./gal.

Estimated paint usage per year in the pipe coating process is 1500 gal. Organic solvent content is 74.9% with a solvent density of 7.25 lb./gal.

If you require move information, please contact me.

Yours truly,

Dennis Lennox/ Plant Engineer

c. Lansing

# 2455 N. Williams Lake Road Pontiac, Michigan 48054

# November 17, 1982

Republic Steel Corporation Steel & Tubes Division 965 Wanda Avenue Ferndale, Michigan 48220

Attention: Mr. Dennis F. Lennox

### Gentlemen:

This is to inform you that the Michigan Air Pollution Control Commission adopted new regulations which may affect your existing miscellaneous metal products coating line. Enclosed is a copy of the rule addressing these requirements.

Specifically, Rule 621 restricts the amount of volatile organic compounds which may be emitted from existing metallic product coating lines.

A person responsible for the operation of any existing source subject to this rule must also submit to the Commission a written program for compliance with the specified limits or evidence of compliance with these limits. Your company has 120 days from the date of this letter to meet this requirement.

It is important that you begin immediately to develop an acceptable program. Your program should specify the method that will be used to achieve compliance. If new equipment or process changes will be necessary, your program should also specify the dates that:

- 1. an air use permit application will be submitted,
- 2. equipment will be ordered,
- 3. construction will begin, and
- 4. compliance will be achieved.

It may also be possible to meet the emission limits through the use of high solids paints.

If you are currently in compliance with these limitations and are able to demonstrate compliance, you should submit a copy of the emission testing or material analysis which demonstrates compliance.

If you believe you are exempt from Rule 621 under any of the various exemptions listed in the rule, you should provide documentation to that effect.

We request that you respond immediately to this letter, indicating its receipt. Please include the total annual paint usage (in gallons per year) on your miscellaneous metal coating lines and the number of such lines that you operate. Also include the organic solvent percentage of the paint as applied and the density (in pounds per gallon) of the solvent.

If you have any questions, please feel free to call this office at (313) 666-2700. We will be happy to discuss this new regulation with you.

Sincerely,

David M. Yanochko Environmental Engineer

Air Quality Division

DMY/MAK:mh

Enclosure

#### FERNDALE (con't.)

EXCELDA MFG CO INC (con't.)
VP: Fred Coxen Emp: 21, Est: 1930, SIC: 2842 Cleaning & polishing agents for auto

#### FERNDALE LABS INC

780 W 6 Mile Rd (48220) Emp: 39. Est: 1897. Sq. Ft: 20,000. Annual Sis: 1.1-5MM. Export. in House Computer: Burroughs SIC: 2834

#### •FLEXON INC

Phermaceuticals.

2020 Burdette (48220) Phone.......313 543-6680 Owner(a): John L Kroha Sr Buyer: Tim Sutherland Plant Mgr: Robert Weiler Emp: 70. Est: 1977. Sq. Ft: 15,000. Annual Sis: 1.1-5MM. Rach, facilities, Export. SIC: 3714 3564 3589 3599 3879 Automobile parts & access: pollution control eqpt, ignition systs; elex eopt/filters, oil, air/metal indl hose.

#### **•FLYNN MFG/FLYNN MACHINE** PRDTS

1561 E 8 Mile Rd (48220) Emp: 16. Est: 1915. Sq. Ft: 10,000. Annual Sis: 251-500M, Export. SIC: 3545 2819 3423 3541 3599 Bonng neads, bars, tools & access, thread measuring wires.

## **FOUR SEASONS WINDOW CORP**

1333 E 8 Mile Rd (48220) .... 3 13 542-8300 Emp: 27. Est: 1949. Sq. Ft: 30,000. In House Computer: I B M SIC: 3442 Aluminum windows & curtain wall

#### **GAGE PROTS CO**

625 Wanda Ave (48220) Purch Agent: Maria Pearson Emp: 75. Est: 1937. Annual Sis: 10.1-50MM. Rsch. facilities. In House Computer: Besic Four SIC: 2899 industrial, organic chemicals, paints.

#### **GALEN INC**

Div Special Machine & Engrg 1450 Jarvis (48220) Emp: 32. SIC: 3559 O E M machinery builders.

# •GLENZER, J C CO INC

Div Hanson-Whitney Co 15 15 Jarvis Ave (48220) Sq. Ft: 20,000. Annual Sis: 1.1-5MM. Rach. facilities. Export. SIC: 3545 3541 3546 Tool holders, chucks, drills, thread-

#### •GREER STEEL CO

1520 E 9 Mile Rd (48220) Emp: 24. Est: 1920. Sq. Ft: 36,000.
Annual Sis: 1.1-5MM. Export. SIC: 3399 3312 3316 5051 Cold rolled strip & spring steel.

#### HANSON CO

2605 Burdette (48220) Plant Mgr: John Marcozzi Emp: 25. Est: 1947. Sq. Ft: 30,000. Rsch. facilities. SIC: 3291 Grinding wheels.

# HENNELLS INC/DIV SMILLIE, C

1200 Woodward Hgts Blvd (48220) ......313 545-4120 Emp: 27. SIC: 3599 3495 3511 3622 3714 Cylinders, springs, hydraulic boosters.

#### HOYT BRUMM & LINK INC

2305 Hilton (48220)... 313 548-3355 Pres: Arthur F Link Emp: 112, Est: 1969. SIC: 3541 3498 Pipe labricators.

#### I C C FABRICATING INC

23430 Woodward (48220) Emp: 7. Est: 1978. Sq. Ft: 8,000. SIC: 3079 3993 Fabricated plastic items, commercial displays & automotive after market

#### I E & E INDS INC

2421 Wolcott (48220) Phone..... Gen Mgr: M Kasprick . 313 542-8255 Emp: 35. Est: 1969. Sg. Ft: 12,000. SIC: 3679 Electronic sub assemblies & printed circuit boards.

#### +ILLINOIS/ECLIPSE

Div Illinois Tool Works Inc 1600 Bonner Ave (48220) Emp: 150, Est: 1912, Import. Export.

SIC: 3541 Metal cutting tools.

## J B INDS INC

1460 Channing (48220) V P: Donald Gardiner Emp: 33. Est; 1963. Sq. Ft: 14,000. SIC: 3544 3599 Tools & dies, jigs, fixtures, drilling &

# J & S ELECTRIC CO INC

3285 Bermuda (48220) Emp: 11. Est; 1980. Sq. Ft; 4,000. SIC: 3622 3813 3829 3728 3822 indi controls.

### JEFFERSON IRON WORKS INC

2441 Wolcott (48220) SIC: 3599 Planer work.

## KAR NUT PROTS CO

1525 Wanda (48220)  Purch Agest: Alizad J Gow Emp: 100. Est: 1933. SIC: 2099 Processors of edible outs

KEN WOOD INDS INC 1894 9 Mile Rd E (48220) Pres: John R Ureel Emp: 12. Est: 1967. Sa. Ft: 10,000 Annual Sis: 501M-1MM. SIC: 3544 Tools & dies

#### **\*KOPPY CORP**

1530 Farrow (48220) V P: Sheldon Sampson Contrl: D Prentis Emp: 80. Est: 1939. Sq. Ft: 24,000 Annual Sts: 5,1-10MM, Export. StC: 3544 3494 3545 3559 Specialized tools, dies, fixtures &

### **•L T V STEEL/TUBULAR DIV**

965 Wanda (48220)... 313 398-1600 Plant Engr. Jesse Fulton Emp: 110. Est: 1929. Sq. Ft: 225,000. Annual Sis: Over 50MM, Export. SIC: 3312 3644 E M T conduit & mechanical steel tubing.

#### \*LANDIS MFG CO INC

2035 Hilton (48220)... 313 545-8288 Pres: C L Bricker Emp: 47. Est: 1940. Import. Export. in House Computer: Hewlett Packard SIC: 3714 Automotive parts.

#### A SALLE FOUNDRY & MACHINE CO

1221 Wordsworth (48220) Phone..... Owner(s): W. Bock ........... 313 548-5550 Emp: 21. Est: 1968. Sq. FI: 11.000. Annual Sis: 501M-1MM. SIC: 3361 3362 R W M A copper alloy, bronze & aluminum casting.

#### LATTNER BROS MACHINING INC 670 E Troy/Box 20158 (48220)

V P: Buck Latiner Emp: 26. Est: 1949. Sq. Ft: 18,000. Annual Sis: 1.1-5MM. SIC: 3451 Automatic screw machine & cold headed ordis.

#### LOWRY & CROSS SCREW PRDTS

726 E Breckenridge (48220) Annual Sis: 101-250M. SIC: 3451 Screw machine products.

#### M C C POWERS

530 Livernois (48220) Branch Mgr: J Seguin Emp: 50. SIC: 3823 3612 Controls, control systs & regulators.

## MACDERMID INC

1221 Farrow St (48220) V P: Carl E Landon Treas: William Buffing Contri: Gerald F Renne Gen Mgr: Jim Batozynski Sis Mgr: James Snow Emp: 55. Est: 1952. Sq. Ft: 76,800. Annual Sis: 1.1-5MM. Export. SIC: 2899

Chem processes, eqpt for metal, plastic linishing, printed circuits.

### MARTINI DIE & ENGRG CO

1840 E 9 Mile Rd (48220) Pros: Harry Hastilow
V P: Mary Hastilow V P Mig: Jerry Foater Purch Agent: Kenneth Chaimers Chi Engr: Max Davey Emp: 65. Est: 1950. Sq. Ft: 53,000. Annual Sis: 5.1-10MM. SIC: 3544 3469 Metal stampings, tool & die.

#### MASKING PRDTS INC

1921 Hilton (48220)... 313 545-4568 Pres: George L Piir V P: Lloyd F Strittmatter Emp: 13. Est: 1969. Sq. Ft: 8,000. Annual Sis: 101-250M. Asch, lacilities. SIC: 3312 3444 Steel fabrication, stainless steel.

#### •MC CORMICK, J S CO/STEVENS DIV

810 Rosewood Ave (48220) Emp: 9. Rsch. facilities. Export. SIC: 3559 Foundry lacings.

# MICHIGAN ACETYLENE PRDTS INC

Div Detroit Gas Prots Co 1250 Farrow (48220). V P: 8 C Crowder Emp: 6. Sq. Ft: 5,000. Annual Sis: 501M-1MM SIC: 2813 Aceiviene gas.

#### MIDWEST WIRE PRDTS CO INC.

800 Woodward Hts Blvd (48220) V P: W J Kane Jr V P: Jerry Schalfran Purch Agent: Chris Wozniacki Persni Mgr: Joan Schilling Emp: 125. Est: 1927. Sq. Ft: 70,000. Annual Sis: 1.1-5MM Rsch. lacilities. In House Computer: Radio Shack Model: T R S-80 SIC: 3496 2542 3537 Material handling baskets, travs & racks, forming wire.

# NACHMAN/A LEGGETT & PLATT

CO Div Leggett & Platt Inc 313 544-7600 Plant Supt: F Alter Plant Mgr: W Ciupka Emp: 36. Est: 1923. Sq. Ft: 57,000. SIC: 2515 Mattress & bed springs.

#### NEW YORK BAGEL BAKERY CO

23316 Woodward (48220) Phone...... 313 548-2580 Pres: Harvey Goldsmith Emp: 39. Est: 1922. Sq. Ft: 5,000. SIC: 2051 Bagels.

# NORTH AMERICAN POLISH CORP

850 E Troy Ave (48220) 313 548-6852 Pres: James H Saker V P; Glen R Dreisbach Treas: Nancy Dreisbach Mktg Mgr: Isobel Saker Plant Mgr: Lovene P Saker Est: 1899. Annual Sis: Under 100M SIC: 2842 Metal polishes: brass, copper. chrome & stainless steel, line silver.